

To: Knoxville-Knox County Planning Commission  
From: Community Forum, Larry Silverstein, Chairperson  
Re: Agenda Item # 7, July 10, 2025 Agenda. File # 7-B-25-OA  
Date: July 7, 2025

The Community Forum is an organization with members residing in numerous neighborhoods in the City of Knoxville and Knox County.

We request that the RN-1 and RN-2 zoning districts be deleted from the proposed amendments creating Single-Family Attached Dwellings to allow additional time to review the proposed Dimensional Standards in these districts, or in the alternative, that the entire list of amendments to the Zoning Code be postponed 60 days for further review. **(See Table 4-2)**

Also be aware of the fact that the Single-Family Attached Dwelling zoning amendment included in the Preliminary Agenda was incomplete. As a result, the proposed ordinance being considered for adoption was not available to the public for review until late Thursday, July 2. The changes are substantial in nature.

The Dimensional Standards such as minimum lot width, as well as the number of driveways for Single-Family Attached Dwellings **(up until July 2, 2025, were called Single-Unit Attached Dwellings)** proposed for RN-1 and RN-2, produce a development design which is not compatible with the character of typical low-density neighborhoods.

Mr. Berry's June, 17, 2025, Memo describing the zoning ordinance amendment states: *"This helps to further expand housing options, use land efficiently and increase access to home ownership."* We support the goals expressed in the Memo.

However, we also support the zoning ordinance intent and public policy that Two-Family Dwellings (Duplexes), and, therefore, the proposed Single-Family Attached Dwellings, be designed so that they fit into, and are compatible with, the surrounding neighborhoods. This policy was reinforced in the 1-17-25 One Year Plan Proposed Updates, which states *"These design criteria help to ensure duplexes fit into surrounding neighborhoods."*

In RN-1 and RN-2 districts, the proposed Minimum Lot Width and Minimum Lot Area for Single-Family Attached Dwellings were established by simply dividing in half the Minimum Lot Width and Minimum Lot Area presently required for Two-Family Dwellings (Duplexes). Thus, the minimum lot widths in RN-1 is 37.5' and in RN-2 is 25'. Unfortunately, that simple division fails to take into consideration the fact that creating two lots where there was one lot, potentially doubles the number of driveways and curb cuts, and therefore has a significant impact on

design. The Minimum Width of a driveway is 10 ft. and the Minimum Width of a Curb Cut is 15 ft. **(See Table 4-2, Table 11-5, Table 11-7)**

For instance, on a 75 ft. wide lot, a Two-Family Dwelling in RN-1 is served by one minimum 10' wide driveway and one minimum 15' wide curb cut. With a Single-Family Attached Dwelling, each dwelling unit is on a 37.5 ft. wide lot and each lot will potentially be served by one minimum 10' wide driveway and one minimum 15' wide curb cut. Forty percent of the street frontage will be a curb cut.

The impact of going from one driveway to serve a Two-Family Dwelling on one lot, to potentially two driveways in the Single-Family Attached Dwelling, with one driveway to serve each dwelling unit on each separate lot, is even more significant in the RN-2 District. The Minimum Lot Width for each dwelling unit of the Single-Family Attached Dwelling is 25 ft., and each dwelling unit would potentially have one-10 ft. wide driveway and one-15 ft. wide curb cut. Sixty percent of the street frontage will be curb cut.

Clearly the Staff recognized that lot width and the addition of a second driveway and curb cut is a problem. Article 11.3.F, attempts to address the issue by adding a provision that allows one shared driveway by both units, but only if there is a carport or garage. Obviously the narrow lot width (37.5 ft and 25 Ft for RN-1 and RN-2 respectively) cannot accommodate interior side setbacks, a garage or carport and the façade of the dwelling. The lot width would have to be well above the proposed minimum lot widths.

Also note that Article 11.3.F, was not included in the amendments available for public review until July 2.

This brings into question whether the Single-Family Attached Dwelling idea, creating two lots for two attached dwelling units, actually achieves the *"use land efficiently"* goal when compared to a Two-Family Dwelling on one lot.

Another problem is caused by the Single-Family Attached Dwelling introducing a new minimum lot area into the RN-1 District. Introducing a new minimum lot area into a district for only one use opens the door to "the tail wagging the dog" and abuse. **(See Table 4-2)**

In RN-1, the proposed lot area, 7,500 sq. ft., is smaller than the Minimum Lot Area required for the Permitted Use, 10,000 sq. ft., and smaller than the Minimum Lot Area for all residential and non-residential Special Uses, 15,000 and 20,000 sq. ft., respectively. Only a Single-Family Attached Dwelling could be constructed on the 7,500 sq. ft. proposed **NEW** Minimum Lot Area. **(See Table 4-2)**

As proposed, property could be subdivided into two-7,500 sq. ft. lots for the purpose of building a Single-Family Attached Dwelling. There is, of course, no mechanism to ensure the Single-

Family Attached Dwelling would in fact be constructed. If the Single-Family Attached Dwelling was not built, no other use in the RN-1 District could be established on the lots without variances. Rezoning to a more intense residential district would be another option for the owner to get some use of the land. Variances and rezonings undermine the design and character of neighborhoods.

Minimum Lot Area is not a problem in RN-2 because a new Minimum Lot Area is not introduced. The 5,000 sq. ft. Minimum Lot Area for a Single-Family Attached Dwelling is the same as the Minimum Lot Area for the Permitted Use, a Single-Family Detached Dwelling. **(See Table 4-2)**

We also request that **Table 4-2** specifically address the Minimum Interior Side Setback for Single-Family Attached Dwellings.

We request that an illustration of a Single-Family Attached Dwelling be included in the amendment showing the driveway, parking and curb cut requirements. Proposed amended **Article 9.3 J**, provides an illustration that references Two-Family and Single-Family Attached Dwellings, but the illustration does not reflect the design of a Single-Family Attached Dwelling.

For these reasons we request that RN-1 and RN-2 Districts be deleted from the proposed amendments for further review of the Dimensional Standards, or in the alternative, that the entire list of amendments to the Zoning Code be postponed for 60 days.

We also take issue with the July 2, 2025, Staff MEMO. The “SUMMARY OF PROPOSED CHANGES” regarding Article 11.3, F., fails to note that a shared driveway is an option only if a carport or garage is constructed. As written, the “SUMMARY” suggests the problems created by the necessity of a second driveway and curb cut are completely solved by Article 11.3 F. They are not.

The July 2 Staff MEMO, page 1., BACKGROUND:, and page 3, STAFF ANALYSIS, discuss “Attached House”, a use included in prior Knoxville Zoning Ordinances. The MEMO, page 1, states “This proposed ordinance amendment (Single-Family Attached Dwelling), reestablishes that use and incorporates it into existing dimensional, design and parking standards.”

A reading of the 2019 Knoxville Zoning Ordinance makes it clear that the “Attached House” use is not comparable to what is now being proposed as a “Single-Family Attached Dwelling.”

The regulations for “Attached House” in the 2019 zoning code, Article 5, Section 3. C., limits Attached Houses to zoning districts R-1A, R-2, and R-3. Attached Houses were not a Permitted Use or a Use Permitted on Review, in the R-1 and R-1E zoning districts. The R-1 and R-1E zoning districts became the RN-1 zoning district in the present Knoxville Zoning Ordinance. Therefore,

“Single-Family Attached Dwelling” is indeed a new use in RN-1 and is not a use being “reestablished” in that district.

Also, the “Attached House” concept required a significant land area. Article 5, Section 3. C. 6. B, of the 2019 zoning ordinance states “1. [Minimum Area.] A minimum area of three (3) acres, exclusive of streets, in single ownership or control, shall be developed.”

Due to important issues with the Staff Memo dated July 2,2025, there is further justification for a postponement of these proposed amendments.

Thank you for your consideration.

Sincerely,

Larry Silverstein, Chairperson of Community Forum