

Planning Commissioners:

I am writing to provide feedback regarding the proposed amendments to the Middle Housing ordinance. I am fully supportive of code refinement efforts to better reflect its purposes: to “increase housing options within the City” and “promote the development of neighborhood-scale housing forms which are compatible with existing housing.” I am concerned that some of the proposed changes are not sufficiently responsive to and fine-tuned for the specific conditions that are present in Knoxville neighborhoods and that these changes will result in consequences which are contrary to this goal.

I agree with the need to clarify the code’s intent regarding the application of middle housing on nonconforming lots. I am also supportive of alleviating the subjectivity and administrative burden of issuing internal variances on lot widths. Even so, I believe the proposed revisions over-correct the issue. Setting 40’ as the minimum lot width, without leaving room for variance, presents a hard threshold effect where a single foot of lot width can make the difference between 4 units and 1, even when the site conditions and built form controls would clearly support something in between (as recognized by the existing code, which allows a fourplex on as little as 36’ width).

ReCode and Middle Housing ordinances have long neglected the surprising abundance (and dimensional diversity) of historic residential parcels less than 40’ wide. Though such parcels do not represent the majority of city-wide or even TDR-wide lots, if you spend any amount of time in Mechanicsville, Fort Sanders, Downtown North, or Happy Holler* – or even perusing urban neighborhoods on KGIS – you are bound to notice that on certain blockfaces, especially in some of the most urban, walkable areas (best candidates for middle housing), 40’ and 50’ lots are actually the local minority. Rather than treat unique lots as anomalies and signal developers to combine or otherwise conform them to modern expectations of what urban lots should be, I suggest we leverage the oddities of our city’s unique historic development pattern to cultivate local character.

The code already controls the size, scale, and form of MH developments through setback, height, depth, and design standards. If these controls are well-designed, it will not be possible for a multi-unit development on any lot, even small lots, to appear outside of “footprints and scales comparable to single-family houses.” Ironically, a single family housing development on a 25’ wide lot under the base zoning has capacity to feel denser and arguably more out of character than a multi-unit development on the same lot under MH due to the difference in form controls. Similarly, any development that would max out the possible development on a small lot under MH can already be built by right on a larger lot. Form controls already limit development intensity. Adding rigid lot width limitations is redundant and unnecessarily stifles middle housing development.

I believe there is a similar issue with the proposal to exclude certain triplex configurations (staff calls “side-facing townhouses”). Side-by-side triplexes can no more “deliver taller massings which loom over adjacent neighbors” than stacked triplexes because in either case their forms are dictated by the code’s form controls. I am concerned that adding limitations on unit configurations unnecessarily will discourage creative design solutions and disincentivize precisely the sort of development the ordinance seeks to promote.

In summary, I appeal to the stated objectives of the MH ordinance (increase housing options in house-scale forms) to argue that we should let form controls do the heavy lifting and be careful not to over-regulate in other areas.

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*e.g. Cornelia / Shepard St, Worth St / Davanna St, W Anderson & W Baxter near Central, E Anderson / Folsom, Dameron Ave / Wray St, Cansler Ave, W Fourth Ave, Forest Ave / 16th St, etc. That some of these blockfaces are located outside of TDR is beside the point; their relevance lies in their presence as an existing typology in historically-residential, walkable, urban areas of Knoxville