

East Tennessee REALTORS® Comments:
Knoxville-Knox County Planning Ordinance Amendments
July 10, 2025

7-C-25-OA Clarifies middle housing standards: ETNR is against but would support with adjustments

This is well-intentioned, hoping to streamline the process for middle housing. We applaud the staff for their effort to remove ambiguity from the review process and safeguard the quality and form of new housing types, which should help to build local confidence and support for middle housing.

However, some of the changes made need further consideration. Our historical development pattern and the “charm” of Knoxville that we all love has been traditionally diverse in size and housing type, which is worth preserving – if we make broadly restrictive adjustments based on dimension rather than form, it encourages sameness in design and discourages that historically varied housing character.

It is already difficult to make middle housing work within the existing standards, which is why we do not have a bulk of local builders clamoring to do these projects and only 60 were approved in total since middle housing’s inception last year. As we make revisions to improve the process, the goal should be to make this type of housing more feasible to build, not less. Middle housing is a way to give more families access to homes inside the city that are walkable and connected to neighbors, amenities, transport, businesses and jobs.

- **Issue 4.6.C Table 4-4:** Removes administrative variance for lot width and instead grants 5% width reduction by default only on duplex/triplex/fourplex. This by itself doesn’t seem to affect a significant number of lots and planning staff have noted the variance was not used at all – but when combined with the nonconforming lot update it significantly reduces the potential inventory for middle housing.

One reason this variance was not used is that many of the lots developed under middle housing standards were nonconforming lots of record and were approved based on that exemption. This would be especially impactful for the multiplex housing type – with the variance, the required lot width is 56’. Without, it would be 70.

- **Example solution:** Agree with removing the administrative variation to streamline the process but lower the required lot size across the board by 20% including multiplexes.
- **Issue 4.6.E.b Middle Housing Standards:** Foundation to roof height requirement for projections rules out architectural features like picture windows or second story entrance overhangs, resulting in non-functional and aesthetically displeasing additions.
 - **Example solution:** Change language to read: “Each recess or projection shall be at least two feet in width and extend the height of at least one story of the structure.” This allows for things like picture windows and fulfills the aesthetic goal not to have a mostly blank wall with an odd projection.