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August 10, 2026

Knoxville-Knox County Planning
City-County Building
400 Main Street, Suite 403
Knoxville, TN 37902

Re: 7729 Strawberry Plains Pike
Agenda No. 13
8-A-26-PA and 8-A-26-RZ

Dear Planning Commission:

I represent the applicant for the rezoning application for Property at 7729 Strawberry Plains Pike (Tax ID 73-0103) (the "Property"). This 6.42-acre parcel is still zoned Agriculture (A), but it is within a "Suburban Residential" (SR) Comprehensive Land Use Placetype. The Property has an established commercial indoor pickle-ball business on the front portion of the Property.¹ This business has struggled, and the intent behind the application is to rezone the Property to Rural Commercial, with the corresponding map amendment to Rural Crossroads Commercial, to allow the rear portion of the Property to be further utilized for a self-storage facility to support the current use and business and allow both to continue operations as the area continues to grow. Although staff is recommended denial and I would respectfully request that you overturn staff's recommendation and approve this application.

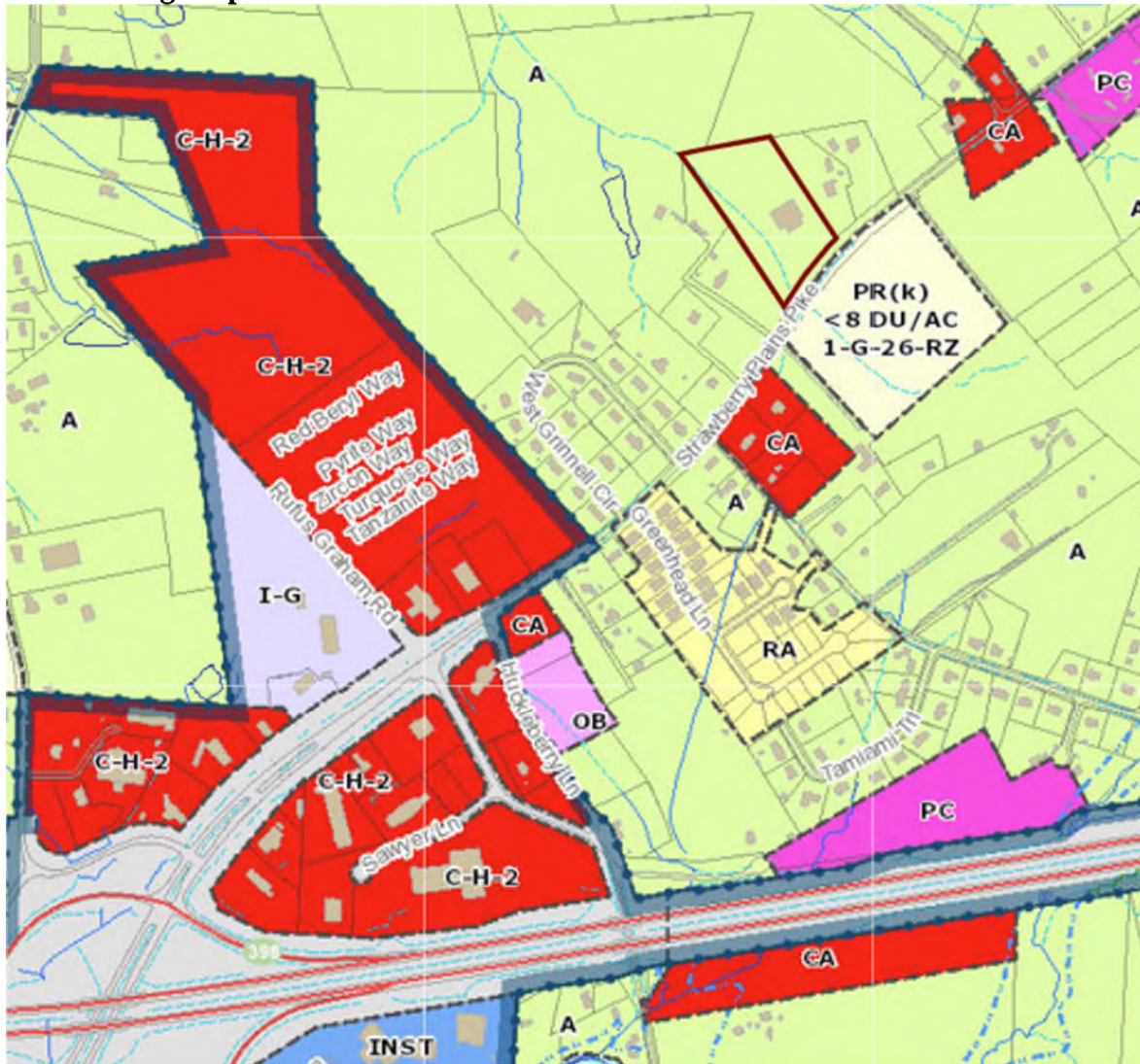
¹ See 5-D-23-UR (<https://www.kgis.org/CaseSummaries/5-D-23-UR.pdf>) where this use was approved as a Use-on-Review in the A zone. A prior effort to rezone the property to PR at 5 du/ac was withdrawn (<https://www.kgis.org/CaseSummaries/10-O-21-RZ.pdf>).

I. The Property in Context:

The Property is accessed by Strawberry Plains Pike, a minor arterial road with 24 feet of pavement width within a right-of-way width that varies from 100 to 105 feet. The property is in the Urban Growth Boundary of the 2024 Growth Policy Plan and is within ~1,400 feet of the City limits and a Highway Commercial node near the intersection of Strawberry Plains Pike and Interstate 40. Carter Elementary school is ~1.5 miles to the east.

There is CA zoned property ~300 feet to its southwest and CA property ~ 700 feet to the east (“Feagins Property”). Planning staff and Planning Commission was recently recommended approval for the Feagins Property for a plan amendment to RCC and a rezoning to RC same as requested by this applicant. See 5-E-26-PA and 5-L-26-RZ.

Area Zoning Map:



II. Changing Conditions Supporting the Map Amendment:

There are substantial changing conditions to support the Map Amendment from SR to RCC. When a map designation is not in error, then two of four amendment criteria must be satisfied. This application meets 2 of the 4 criteria:

1. CHANGES OF CONDITIONS (SUCH AS SURROUNDING LAND USES, ZONING, UNCONTROLLED NATURAL FORCES/DISASTERS, ETC.):

- a. Although commercial development in the surrounding area has largely been concentrated near the I-40 Strawberry Plains Pike interchange to the west and Asheville Highway to the east, recent commercial developments, including the Feagins Property, have been expanding east along Strawberry Plains Pike. Recent efforts to rezone this property to Planned Residential were unsuccessful.
 - i. Since the Pickleball operations were established in 2025, the area within a 0.25-mile radius has continued to transition from low intensity use to a higher-intensity mixed residential and commercial area.
 - ii. Construction has commenced for a 348-unit apartment and townhome development at 716 Orange Diamond Way (across from Aubreys).
 - iii. The 37924 zip code continues to be one of the fastest growing sectors of Knox County justifying more commercial amenities to service a growing residential population.
 - iv. The proposed RCC designation supports the County's goals of concentrating more intensive development along corridors and arteries to reduce commuting distances to commercial operations.
- b. The RCC (Rural Crossroads Commercial) place type is described as areas appropriate for small commercial nodes occurring at or near intersections within rural areas. This area is rural in character, and the increased residential development and existing commercial use on the property support consideration of the RCC place type at this location.

2. THE PROPOSED CHANGES SUPPORT THE POLICIES AND ACTIONS, GOALS, OBJECTIVES, AND CRITERIA OF THE PLAN:

- a. The requested RCC place type is consistent with the Comprehensive Plan's Implementation Policy 5: Create neighborhoods with a variety of housing types

and amenities in close proximity. The RCC place type supports small-scale commercial and nonresidential development near residential areas.

Staff's primary objection with the RCC placetype is because this property is not located at an intersection; however, the RCC placetype does not require it be on a corner. As noted by our 2024 Comprehensive Land Use and Transportation plan, Page 39, "[Rural] Crossroads are typically located at, or within 400 feet of, the intersection of arterial or collector roads. These areas may or may not have a connected street pattern." The language "typically" is not mandatory, and recent precedent have supported the placement of the RCC placetype on properties which are located near, but not on, an intersection.² Here, the Property is near the intersection of S. Woodale and Strawberry Plains Pike, and the large commercial node to the east. Thus, the application meets the intent of the RCC placetype and 2 of the 4 required criteria.

III. Changing Conditions to Support the CR Zoning:

Staff's recommendation to deny the CR zoning is simply based on its incompatibility with the SR placetype. Having demonstrated that the Plan Amendment to RCC is appropriate, the rezoning to CR should be approved because it is consistent with the RCC placetype.

Nevertheless, there are substantial changed conditions to support the rezoning in this case.

1. PURSUANT TO THE KNOX COUNTY ZONING ORDINANCE, ARTICLE 6.30.01, THE FOLLOWING CONDITIONS MUST BE MET FOR ALL REZONINGS (must meet all of these): THE PROPOSED AMENDMENT SHALL BE NECESSARY BECAUSE OF SUBSTANTIALLY CHANGED OR CHANGING CONDITIONS IN THE AREA AND ZONES AFFECTED, OR IN THE COUNTY GENERALLY.
 - a. Since the early 1980s, the surrounding area has experienced a gradual transition away from A (Agricultural) zoning. Rezoning to commercial, industrial, and office zones have been concentrated near the Strawberry Plains Pike and I-40 interchange, while RA (Low-Density Residential) and PR (Planned Residential) with up to 5 to 8 du/ac rezonings have been focused to the northeast along Strawberry Plains Pike.
 - b. There has been a significant increase in residential development in the area since 2021. The Hunters Woods 39-lot single-family subdivision and the Universal at Strawberry Plains, a 349-unit housing development featuring

² See 5-A-26-PA/5-A-26-RZ, (<https://www.kgis.org/CaseSummaries/5-A-26-PA.pdf>) applying an RCC place type and RC zoning on property that is not on an intersection.

apartment and townhouse dwellings, are both under construction approximately 0.25 miles west of the subject property.

- c. Nonresidential development has included a mix of service-oriented establishments, trucking and warehousing, lodging establishments, and medical and dental clinics, primarily concentrated near existing commercial nodes. A new indoor pickleball facility was opened on the subject property in November 2024, and a small multi-tenant commercial building was constructed on the portion ~360 feet east of the subject property in February 2025.

2. THE PROPOSED AMENDMENT SHALL BE CONSISTENT WITH THE INTENT AND PURPOSES OF THE APPLICABLE ZONING ORDINANCE.

- a. The CR (Rural Commercial) zone is intended to provide opportunities to locate limited retail and service uses in a manner convenient to outlying rural areas.
- b. Rezoning should be based on the entire range of uses allowed within a zone to ensure that any development brought forth at a future time would be compatible with the surrounding land uses. The range of uses permitted in the CR zone is limited to those generally patronized by area residents on a frequent basis. The allowable uses in the CR zone are less intensive than and are generally compatible with those of the neighboring CA (General Business) zonings at the intersection of Strawberry Plains Pike and S Wooddale Road and immediately to the southwest.
- c. Even though the entire ranges of uses should be considered, there is an existing commercial operation already established on the Property, and the inclusion of additional operations, such as the intended self-storage operation, shall be complimentary to the existing business helping sustain its viability until residential build-out catches up to current development approvals in the area.

3. THE PROPOSED AMENDMENT SHALL NOT ADVERSELY AFFECT ANY OTHER PART OF THE COUNTY NOR SHALL ANY DIRECT OR INDIRECT ADVERSE EFFECTS RESULT FROM SUCH AN AMENDMENT

- a. The CR zone has development performance standards, such as increased setbacks and landscaping requirements when adjacent to residential zones, to maximize compatibility between commercial uses and surrounding areas

(Article 5, Section 5.37.06-09). Site development standards also call for ample landscaping in parking areas and around the building façade, and for all site lighting to be directed away from residential zones and any public rights-of-way.

- b. The proposed rezoning is not anticipated to negatively impact the surrounding area. The intended use, self-storage to complement current pickle-ball operations, is a low-intensive use that generates little traffic or anticipated impact to the surrounding communities.
4. PROPOSED AMENDMENT SHALL BE CONSISTENT WITH AND NOT IN CONFLICT WITH THE COMPREHENSIVE PLAN OF KNOX COUNTY, INCLUDING ANY OF ITS ELEMENTS, MAJOR ROAD PLAN, LAND USE PLAN, COMMUNITY FACILITIES PLAN, AND OTHERS.
- a. The CR zone is consistent with the recommended plan amendment to the RCC (Rural Crossroads Commercial) place type, which recommends a land use mix of primarily commercial, civic, and residential uses, and building forms with heights limited to 1-2 stories. The allowable uses and dimensional standards of the CR zone align with the intent of the RCC place type, as the allowable uses are limited to those generally patronized frequently by nearby residents, and building heights are limited to 35 ft.
 - b. The proposed rezoning is consistent with the Comprehensive Plan's Implementation Policy 2: Ensure that development is sensitive to existing community character. The CR zone at this location would allow for a minor expansion of commercial and nonresidential uses on a scale compatible with the surrounding area.
 - c. Access from Strawberry Plains Pike is consistent with the East County Community Plan, which identified Strawberry Plains Pike as a roadway suitable for a more intense development pattern.
 - d. The proposed rezoning is aligned with the property's location in the Urban Growth Area of the Growth Policy Plan, which encourages a reasonably compact pattern of development and promotes expansion of the Knoxville Knox County economy.

VI. Conclusion:

As set forth in this letter, the proposed RCC placetype and CR zoning is supported by changing conditions and further supports the policies and actions, goals, objectives, and criteria of the Comprehensive Land Use and Transportation Plan. The applicant respectfully requests that Planning Commission recommend approval of this map amendment and rezoning to County Commission.

I welcome any questions and look forward to our conversation Thursday.

Sincerely,



Benjamin C. Mullins
FRANTZ, McCONNELL & SEYMOUR, LLP