Old Kensington Homeowners Association, Inc.

To the Members of the Knoxville-Knox County Planning Commission:

Re: Agenda Item 35, 11-D-26-PA and 11-N-26-RZ, 8684 S Northshore Dr (November 12, 2026)

I write on behalf of the Old Kensington Homeowners Association, Inc., which represents the Old Kensington Unit I subdivision [approximately 48 parcels]. We strongly oppose the plan amendment from Rural Conservation (RC) to Suburban Residential (SR) and the rezoning from A to PR at up to 12 du/ac. We believe many neighbors in the wider Kensington community share our concerns.

Public safety is our primary concern. At 12 du/ac, the 11.23-acre site could hold about 135 dwellings, or roughly 1,200 daily vehicle trips by the trip rates Planning staff use. In this section, S Northshore Dr is a two-lane, curving road with no turn lanes or pull-offs and, in places, no shoulders, only ditches and steep embankments. We are not aware of any planned improvements to this segment. We understand the need for housing, but we urge the Commission to approve higher-density development only on roads built to handle it.

Planning staff has analyzed a comparable request. In 5-F-25-PA / 5-N-25-RZ (Snyder Rd, May 2025), a request to amend RC to SR with PR up to 12 du/ac, staff recommended denial. Staff cited the narrow, curving road, lack of shoulders, limited sight distance, absence of planned improvements, and inconsistency with Implementation Policy 9. We understand that the application was withdrawn at the June 12, 2025, Planning Commission meeting before a decision was made. We ask that staff and the Commission apply the same criteria here, where the same density is proposed on a road with similar constraints.

The plan amendment criteria are not met. The RC and Stream Protection designations are intended to conserve forested areas, ridges, wetlands, and other natural areas. We are not aware of any error in the plan, changed conditions, or new road or utility projects that justify the change, and we ask the applicant to identify any.

We respectfully ask the Commission to:

1. Deny the plan amendment and rezoning. At a minimum, defer them until a Knox County-standard traffic impact study (TIS) has been completed and reviewed by Knox County Engineering and TDOT.

2. Direct staff to consult TDOT before the hearing and report any concerns about access spacing, sight distance, turn lanes, or crash history on this segment of S Northshore Dr.

3. Require the TIS to cover the site entrance, nearby intersections including Tooles Bend Rd, and cumulative traffic from approved or pending developments, including 11-B-26-PA / 11-B-26-RZ at 8417 S Northshore Dr.

4. Require a floodplain determination and a preliminary drainage assessment, reviewed by Knox County Engineering and, as applicable, TDEC, showing how runoff and flooding would be managed at the maximum density the rezoning allows.

5. If the request is not denied, limit density to what the RC place type supports, and require the TIS and any needed road improvements, at the developer's expense, before development plan approval.

6. Notify the HOA of the staff recommendation and of any later filings on this property.

Thank you for your consideration.

Respectfully,

Josh Carlon
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