INDEPENDENT PUBLIC COMMENTS

OPPOSING PROPOSED PLAN AMENDMENT & REZONING

8684–8686 S. Northshore Drive | 11-D-26-PA and 11-N-26-RZ

Agenda Item 35 | November 12, 2026 Planning Commission Meeting

November 4, 2026

Dear Planning Commissioners:

I support thoughtful residential development and recognize the need to accommodate growth in Knox County. However, deciding what may eventually be built on a property is different from deciding how much development the County should authorize in the first place. Responsible development requires determining whether the proposed intensity is appropriate for the property, compatible with its surroundings, and reasonably supported by existing infrastructure.

My concerns regarding the proposed Comprehensive Plan amendment and rezoning at 8684–8686 S. Northshore Drive arise from the substantial difference between the requested density and the surrounding development pattern, the property's environmental and physical constraints, and documented transportation conditions along Northshore Drive.

Taken together, these considerations raise a fundamental question: What justifies increasing the permitted residential intensity of this particular property to as much as 12 dwelling units per acre?

For the reasons outlined below, I respectfully request denial of applications 11-D-26-PA and 11-N-26-RZ as proposed.

1 | RURAL CONSERVATION AND THE SURROUNDING DEVELOPMENT PATTERN

The adopted Comprehensive Plan identifies the property as Rural Conservation (RC), with Stream Protection (SP). The requested amendment would change RC to Suburban Residential (SR), accompanied by rezoning from Agricultural (A) to Planned Residential (PR) at up to 12 dwelling units per acre. The RC designation's conservation-oriented approach is particularly relevant where mapped natural features affect the property. A change in place type should have a clear, site-specific planning justification, not rest solely on the possibility of accommodating additional housing.

The accompanying KGIS zoning map shows nearby Agricultural (A), Low Density Residential (RA), and PR districts with labeled density limits of 5 du/ac, less than 5 du/ac, less than 3.15 du/ac, and 1–3 du/ac. The requested 12 du/ac is 2.4 times the mapped 5 du/ac limit and more than 3.8 times a limit below 3.15 du/ac. These are comparisons of zoning limits—not verified built densities—but they demonstrate how sharply the request differs from the immediate zoning context.

The property's existing RC designation also serves as a logical transition between more intensive residential place types to the west and rural and conservation-oriented areas to the east. Changing this designation to SR would weaken that transition and warrants a clear explanation of how compatibility with the adjoining lower-intensity areas would be maintained.

[EXHIBIT B – EXISTING ZONING, COMPREHENSIVE PLAN DESIGNATIONS, SURROUNDING PERMITTED DENSITIES, AND PLACE-TYPE CORRESPONDENCE]

2 | ENVIRONMENTAL CONSTRAINTS AND EFFECTIVE DEVELOPMENT DENSITY

KGIS and FEMA mapping identify a stream corridor, Stream Protection designation, mapped floodplain and floodway, and varying terrain affecting the site. These conditions matter for grading, stormwater management, access, internal circulation, and the amount of land realistically available for residential development. I am not asserting that all mapped constrained land is unbuildable or that a precise development envelope has already been established.

The requested maximum of 12 du/ac applied to approximately 11.24 gross acres yields a theoretical figure of approximately 134 units, subject to applicable rules and later approvals. Gross density, however, does not describe how those units would be distributed if only part of the site accommodates development. The accompanying illustrative effective-density exhibit holds 134 units constant while varying the assumed development area; it does not establish actual net developable acreage, building coverage, or achievable yield. Its purpose is to show why a gross-acreage calculation alone may not convey the concentration of development within the usable portion of an environmentally constrained site.

[EXHIBIT C – ENVIRONMENTAL CONSTRAINTS, FEMA MAPPING, TOPOGRAPHY, AND ILLUSTRATIVE EFFECTIVE DENSITY]

3 | NORTHSHORE DRIVE – SAFETY, ACCESS, AND CAPACITY

S. Northshore Drive (SR 332) is a heavily traveled regional route, predominantly two lanes along much of the corridor, with limited shoulders and turning accommodations in places. The December 2021 Northshore Drive Corridor Study documents historical crash patterns and existing and forecast operational challenges at evaluated locations. The study does not assess this application or predict impacts from a driveway serving the subject parcels. It does, however, establish a factual context for examining additional traffic and access demands.

The Knoxville Regional TPO crash dashboard data compiled from approximately Ebenezer Rd. to Wallace Rd. indicate 330 crashes for September 2016–September 2026. This is a corridor-segment historical count, not a finding about crashes at the proposed site or caused by this application.

These documented roadway conditions are relevant not only to the design of a future development entrance, but also to the threshold decision of whether the surrounding transportation network reasonably supports the requested residential intensity. Deferring all transportation considerations to subsequent development review risks approving a level of development before establishing whether the infrastructure necessary to support it is available or reasonably achievable.

[EXHIBIT D – NORTHSHORE DRIVE CORRIDOR STUDY, TRAFFIC COUNTS, CRASH RECORDS, AND TRANSPORTATION CONSIDERATIONS]

4 | THE ENTITLEMENT DECISION SHOULD COME FIRST

The adopted Comprehensive Plan establishes a framework for evaluating land-use compatibility, environmental conditions, and infrastructure capacity when considering changes in development intensity. Implementation Policies 2, 7, and 9 address community character, conservation of natural features, and coordination of infrastructure with development.

Implementation Action 2.1 addresses appropriate buffers and transitions between differing land uses. As discussed in Section 1, the property's existing RC designation provides a logical transition between more intensive residential areas and adjoining rural and conservation-oriented place types. The proposed amendment raises questions about how the objectives of Action 2.1 would be maintained under the requested SR designation.

Implementation Action 9.3 emphasizes directing growth toward areas served by adequate infrastructure, while Action 9.5 discourages approval of rezonings for isolated developments where necessary major road or utility improvements are inadequate or not yet planned. Given the documented transportation conditions along Northshore Drive, these provisions warrant consideration of whether existing or reasonably anticipated infrastructure can support the requested residential intensity.

Implementation Action IM.6 further requires applicants requesting an amendment to the Comprehensive Plan to provide justification for the proposed change as part of the application process. This reinforces the importance of establishing the planning rationale for redesignating the property from RC to SR before approving the accompanying increase in permitted residential intensity.

Taken together, these provisions underscore the importance of evaluating the requested entitlement on its own merits. Subsequent subdivision and engineering reviews may establish whether a particular development layout satisfies applicable technical standards, but they should not substitute for determining whether the proposed place type and maximum density are appropriate at the outset.

The question before the Commission is not merely whether development could eventually be engineered to meet minimum requirements, but whether the requested increase in permitted residential intensity is justified by the property's characteristics, surrounding development pattern, environmental constraints, and supporting infrastructure.

[EXHIBIT E – COMPREHENSIVE PLAN POLICIES AND ACTION]

5 | REQUESTED COMMISSION ACTION

I respectfully request denial of both applications as proposed. Alternatively, I ask that action be deferred until site-specific evidence supports a reasoned determination of appropriate density, environmental capacity, neighborhood compatibility, safe access, and roadway infrastructure. If a less intensive alternative is considered, its maximum density should be justified on the merits rather than assuming 12 du/ac is suitable.

Responsible growth means matching the intensity authorized to the land and infrastructure that must support it. Please include these comments and the accompanying exhibits in the record for both applications.

Respectfully,



Bri Zigler Clabo
Knox County Resident

SUPPORTING EXHIBITS

OPPOSING PROPOSED PLAN AMENDMENT & REZONING

8684–8686 S. Northshore Drive | 11-D-26-PA and 11-N-26-RZ

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Source-based maps and policy materials supporting independent public comments. Original KGIS and agency graphics are reproduced for context; their mapping does not establish final developable acreage or a site-specific traffic impact.

EXHIBIT INDEX

- A – PROPERTY LOCATION & SURROUNDING CONTEXT
- B – EXISTING ZONING, COMPREHENSIVE PLAN DESIGNATIONS, SURROUNDING PERMITTED DENSITIES, AND PLACE-TYPE CORRESPONDENCE
- C – ENVIRONMENTAL CONSTRAINTS, FEMA MAPPING, TOPOGRAPHY, AND ILLUSTRATIVE EFFECTIVE DENSITY
- D – NORTHSHORE DRIVE CORRIDOR STUDY, TRAFFIC COUNTS, CRASH RECORDS, AND TRANSPORTATION CONSIDERATIONS
- E – COMPREHENSIVE PLAN POLICIES AND ACTIONS

EXHIBIT A

PROPERTY LOCATION & SURROUNDING CONTEXT

OBSERVATIONS

- Northshore Drive and private Sunstone Way frame potential access.



LOCATION



2026 AERIAL

SOURCES

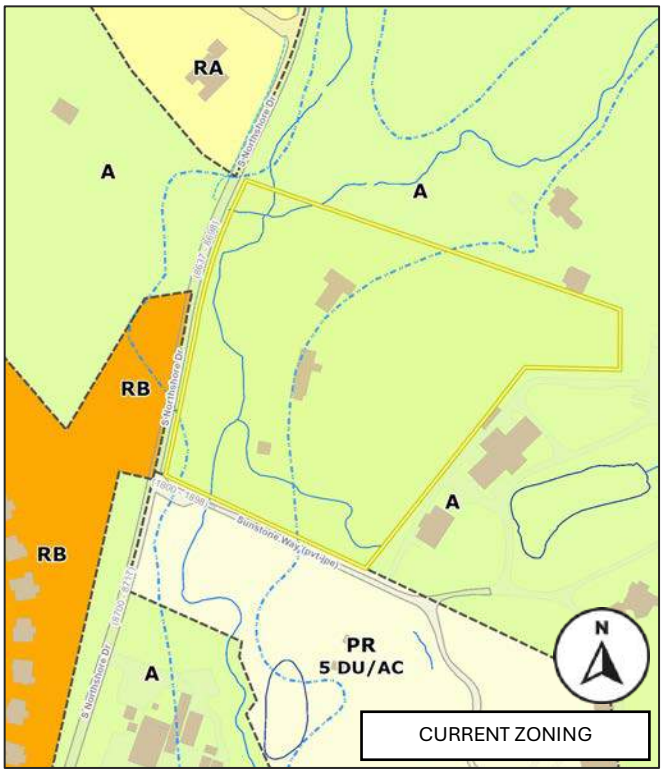
- KGIS exports printed Nov. 3, 2026.

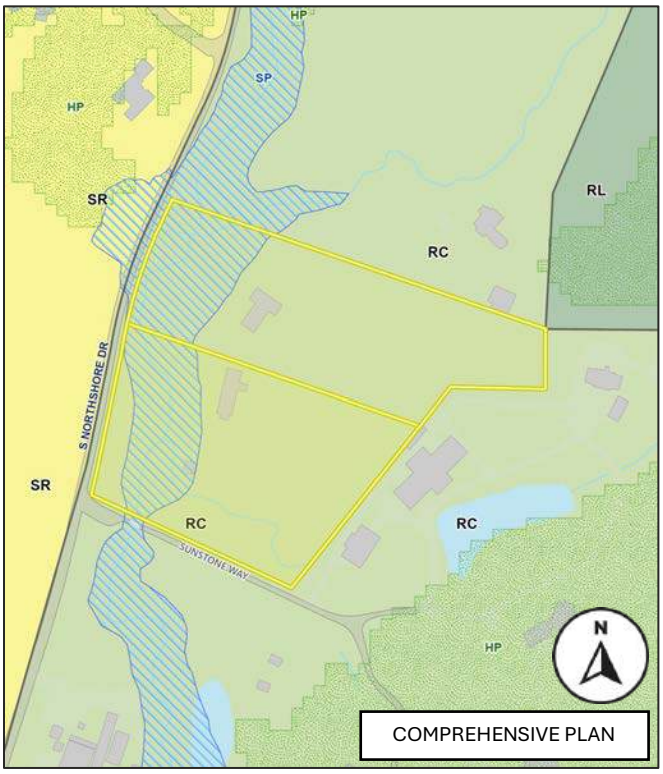
EXHIBIT B

EXISTING ZONING, COMPREHENSIVE PLAN DESIGNATIONS, SURROUNDING PERMITTED DENSITIES, AND PLACE-TYPE CORRESPONDENCE

OBSERVATIONS

- Current Zoning map identifies A zoning on the subject parcels.
- Comprehensive Plan Map identifies RC and SP designations on the subject parcels and as located between SR and RL designations of neighboring parcels.



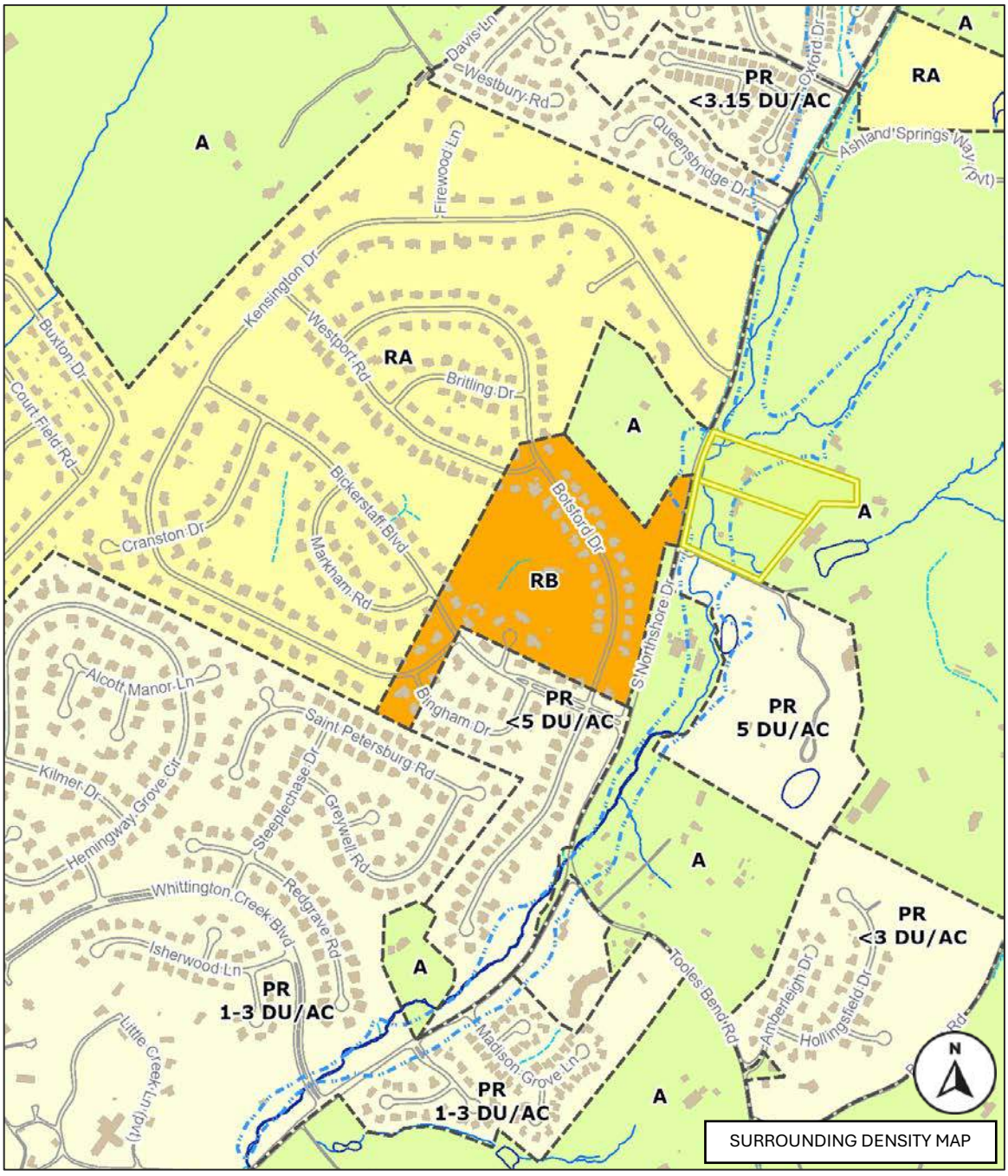


SOURCES

- KGIS exports printed Nov. 3, 2026.

OBSERVATIONS

- Nearby PR districts are designated at densities of 5 du/ac, less than 5 du/ac, less than 3.15 du/ac, and 1–3 du/ac.



SOURCES

- KGIS exports printed Nov. 3, 2026.

EXISTING: RURAL CONSERVATION (RC)

The adopted plan calls for conservation of natural areas through clustering and minimized land disturbance. It describes conserving generally 50-70% of a site as natural open space, and anticipates more compact, low-impact site design in growth areas.

REQUESTED: SUBURBAN RESIDENTIAL (SR)

The plan describes primarily single-family residential development, with some small-scale attached dwellings such as duplexes, multiplexes, and townhomes. Its illustrated building form is 1-2 stories. These descriptions guide evaluation; they do not independently establish a building-height prohibition.



Rural Conservation

Rural Conservation areas are intended to conserve forested areas, ridges, wetlands, and other significant natural areas by clustering development and minimizing land disturbance. Generally, these areas conserve between 50-70 percent of a site as natural open space.

In growth areas, corridors and pockets of rural conservation indicate places that may be subject to development similar to the adjacent place types, but where more compact and low impact site design is expected.

In rural areas, these places are appropriate for residential development in a conservation pattern with lots that are smaller than typical rural lots and are clustered to leave natural areas undeveloped.

EXAMPLE PATTERN

EXAMPLE CHARACTER

LAND USE MIX

Primary Uses: Residential, Single family (conservation pattern)
Secondary Uses: Residential, Attached (conservation pattern); Civic

HOUSING MIX

- Single family residential subdivisions shall be clustered in a pattern that preserves 50 percent or more open space on a given site

FORM ATTRIBUTES*

BUILDING FORM

Height: 1-2 stories
Setback: Varies

TRANSPORTATION

Primary Mode(s): Automobile
Secondary Mode(s): n/a

Parking: Private off-street.
Streets: Primarily automobile access. Subdivisions have long blocks and meandering streets. Sidewalks are uncommon.

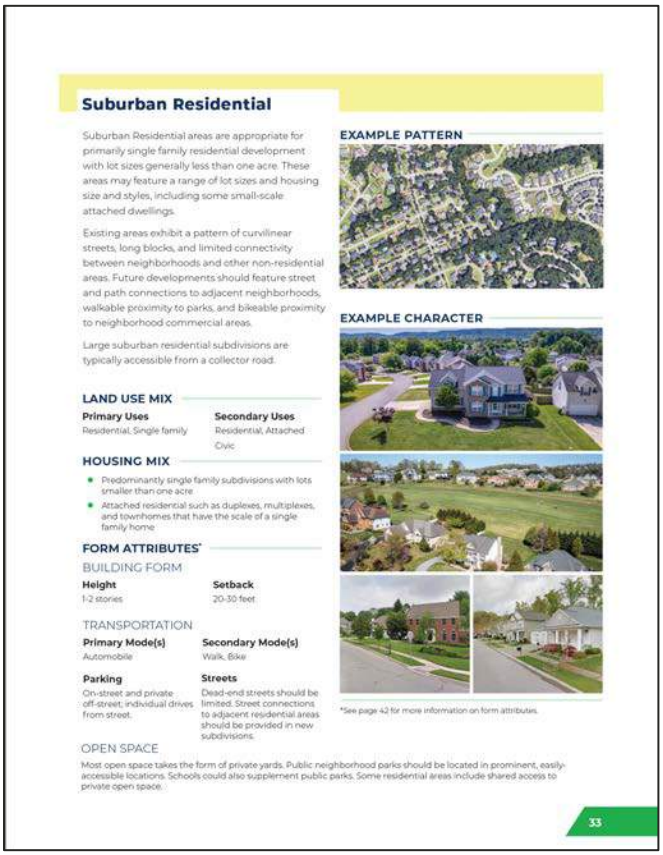
OPEN SPACE

Mostly private. May have trail access.

Conservation design (above, left) yields the same number of homes on a given parcel as a conventional subdivision design (above, right). The conservation design results in less pavement, shorter distances to run utilities, and greater open space preservation.

*See page 42 for more information on form attributes.

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Suburban Residential

Suburban Residential areas are appropriate for primarily single family residential development with lot sizes generally less than one acre. These areas may feature a range of lot sizes and housing size and styles, including some small-scale attached dwellings.

Existing areas exhibit a pattern of curvilinear streets, long blocks, and limited connectivity between neighborhoods and other non-residential areas. Future developments should feature street and path connections to adjacent neighborhoods, walkable proximity to parks, and bikeable proximity to neighborhood commercial areas.

Large suburban residential subdivisions are typically accessible from a collector road.

EXAMPLE PATTERN

EXAMPLE CHARACTER

LAND USE MIX

Primary Uses: Residential, Single family
Secondary Uses: Residential, Attached; Civic

HOUSING MIX

- Predominantly single family subdivisions with lots smaller than one acre
- Attached residential such as duplexes, multiplexes, and townhomes that have the scale of a single family home

FORM ATTRIBUTES*

BUILDING FORM

Height: 1-2 stories
Setback: 20-30 feet

TRANSPORTATION

Primary Mode(s): Automobile
Secondary Mode(s): Walk, Bike

Parking: On-street and private off-street, individual drives from street.
Streets: Dead-end streets should be limited. Street connections to adjacent residential areas should be provided in new subdivisions.

*See page 42 for more information on form attributes.

OPEN SPACE

Most open space takes the form of private yards. Public neighborhood parks should be located in prominent, easily-accessible locations. Schools could also supplement public parks. Some residential areas include shared access to private open space.

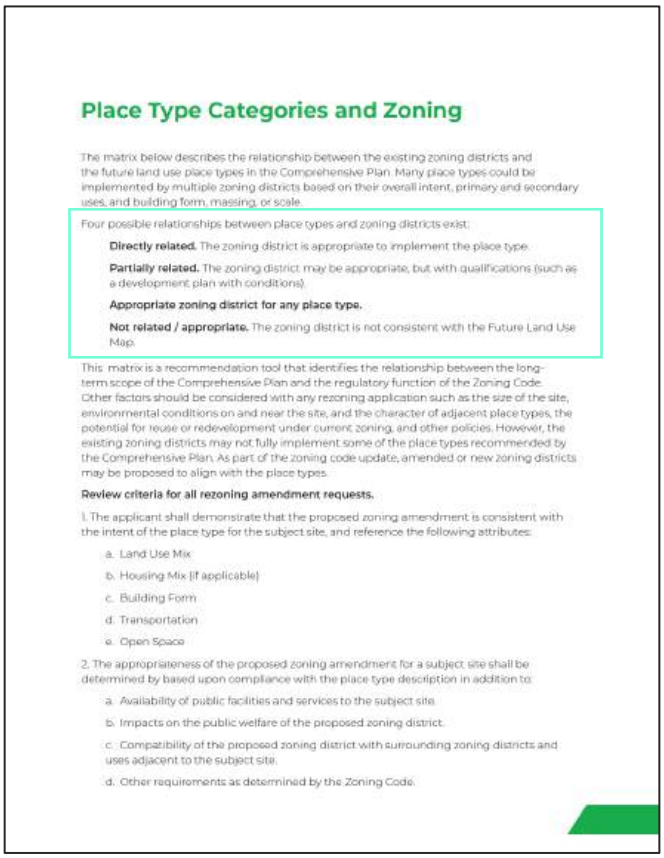
33

SOURCES

- Knox County Comprehensive Plan (2024), PDF p. 42 / printed p. 38; PDF p. 37 / printed p. 33.

REZONING REVIEW CRITERIA

Appendix H directs consideration of land use and housing mix, building form, transportation, open space, public services, public welfare, and compatibility. It specifically identifies site size, environmental conditions, and adjacent place types as relevant. It allows denial or approval with conditions when a rezoning is inappropriate.



Place Type Categories and Zoning

The matrix below describes the relationship between the existing zoning districts and the future land use place types in the Comprehensive Plan. Many place types could be implemented by multiple zoning districts based on their overall intent, primary and secondary uses, and building form, massing, or scale.

Four possible relationships between place types and zoning districts exist:

Directly related. The zoning district is appropriate to implement the place type.

Partially related. The zoning district may be appropriate, but with qualifications (such as a development plan with conditions).

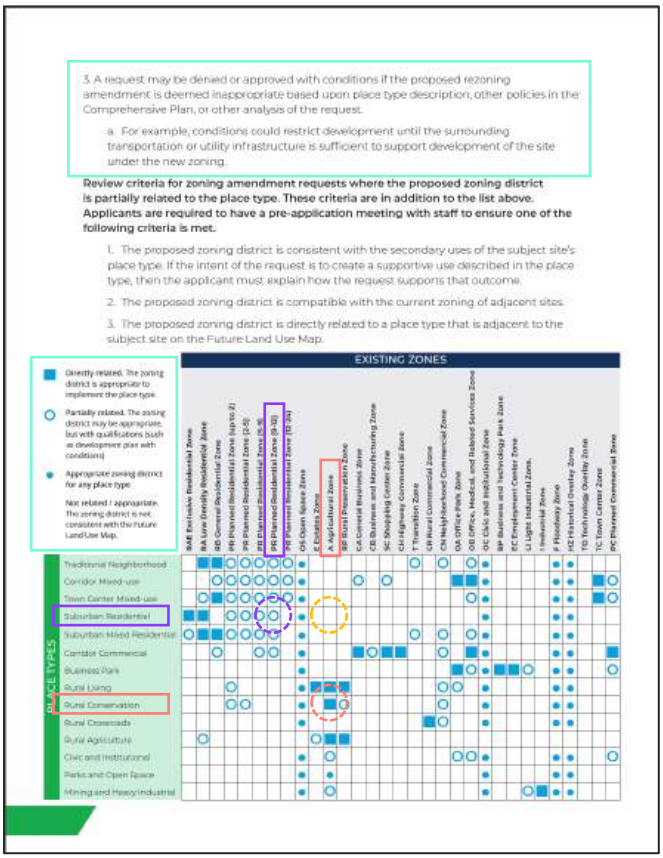
Appropriate zoning district for any place type.

Not related / appropriate. The zoning district is not consistent with the Future Land Use Map.

This matrix is a recommendation tool that identifies the relationship between the long-term scope of the Comprehensive Plan and the regulatory function of the Zoning Code. Other factors should be considered with any rezoning application such as the size of the site, environmental conditions on and near the site, and the character of adjacent place types, the potential for reuse or redevelopment under current zoning, and other policies. However, the existing zoning districts may not fully implement some of the place types recommended by the Comprehensive Plan. As part of the zoning code update, amended or new zoning districts may be proposed to align with the place types.

Review criteria for all rezoning amendment requests.

1. The applicant shall demonstrate that the proposed zoning amendment is consistent with the intent of the place type for the subject site, and reference the following attributes:
   a. Land Use Mix
   b. Housing Mix (if applicable)
   c. Building Form
   d. Transportation
   e. Open Space
2. The appropriateness of the proposed zoning amendment for a subject site shall be determined by based upon compliance with the place type description in addition to:
   a. Availability of public facilities and services to the subject site.
   b. Impacts on the public welfare of the proposed zoning district.
   c. Compatibility of the proposed zoning district with surrounding zoning districts and uses adjacent to the subject site.
   d. Other requirements as determined by the Zoning Code.



3. A request may be denied or approved with conditions if the proposed rezoning amendment is deemed inappropriate based upon place type description, other policies in the Comprehensive Plan, or other analysis of the request.
   a. For example, conditions could restrict development until the surrounding transportation or utility infrastructure is sufficient to support development of the site under the new zoning.

Review criteria for zoning amendment requests where the proposed zoning district is partially related to the place type. These criteria are in addition to the list above. Applicants are required to have a pre-application meeting with staff to ensure one of the following criteria is met.

1. The proposed zoning district is consistent with the secondary uses of the subject site's place type. If the intent of the request is to create a supportive use described in the place type, then the applicant must explain how the request supports that outcome.
2. The proposed zoning district is compatible with the current zoning of adjacent sites.
3. The proposed zoning district is directly related to a place type that is adjacent to the subject site on the Future Land Use Map.

Indicates relevant written descriptions and interpretations as located within Appendix H.

Indicates Current Zoning and the Current Comprehensive Plan Designation / Place Type Designation.

Indicates the relationship between the Current Zoning and the Current Comprehensive Plan Designation / Place Type Designation:
"Directly Related: The Zoning district is appropriate implement the place type."

Indicates Requested Zoning and the Requested Plan Amendment / Place Type Designation.

Indicates the relationship between the Requested Zoning and the Requested Plan Amendment / Place Type Designation:
"Partially Related: The Zoning district may be appropriate, but with qualifications (such as development plan with conditions)."

Indicates the relationship between the Current Zoning and the Requested Plan Amendment / Place Type Designation:
"Not Related / Appropriate: The Zoning district is not consistent with the Future Land Use Map."

SOURCES

- Place Type and Zoning Correspondence Matrix, PDF pp. 2-3.

PLAN IMPLEMENTATION

The Comprehensive Plan states that staff recommendations and Planning and County Commission decisions on development approvals should reference relevant Plan recommendations and policies.



How to Use the Plan

The Comprehensive Plan shall be used on a regular basis as public and private decisions are made concerning development, redevelopment, capital improvements, economic incentives, and other matters affecting Knox County. The following is a summary of how decisions and processes shall align with the goals and actions of the Plan.

ANNUAL WORK PROGRAMS AND BUDGETS

Individual county departments, administrators, boards, and commissions should be cognizant of the recommendations of the Plan when preparing annual work programs and budgets.

DEVELOPMENT APPROVALS

Administrative and legislative approvals of development proposals, including rezonings and subdivision plats, should be a central means of implementing the Plan. Recommendations from staff and decisions by the Knoxville-Knox County Planning Commission and Knox County Commission shall reference relevant Comprehensive Plan recommendations and policies. The zoning code and subdivision regulations shall be updated in response to regulatory strategies presented in the Plan.

CAPITAL IMPROVEMENT PLAN

The county's formal Capital Improvement Plan should be consistent with the Comprehensive Plan's recommendations.

ECONOMIC INCENTIVES

All economic incentive programs should be reviewed to ensure consistency with the recommendations of the Plan.

PRIVATE DEVELOPMENT DECISIONS

Property owners and developers should consider the goals and strategies of the Plan in their land-use planning and investment decisions. Public decision-makers shall use the Plan as a guide in their development deliberations such as zoning matters and infrastructure requests. Property owners and developers should be cognizant of and design projects that complement the Plan's recommendations.

CONSISTENT INTERPRETATION

Knoxville-Knox County Planning will collaborate with all partners including staff and elected and appointed officials to ensure clear and consistent interpretation of the major items in the Plan.

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Indicates relevant written descriptions and interpretations as located within Appendix H.

SOURCES

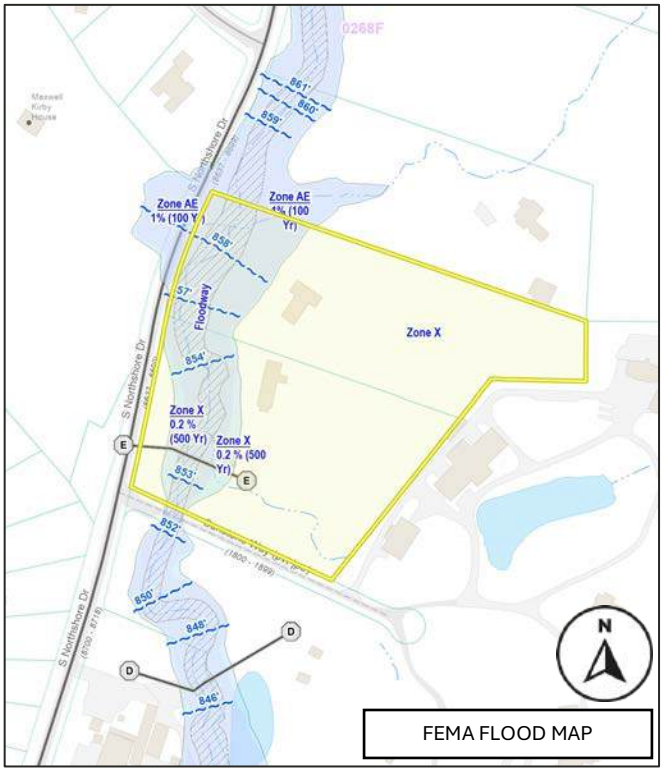
- Knox County Comprehensive Plan (2024), PDF p. 74 / printed p. 70.

EXHIBIT C

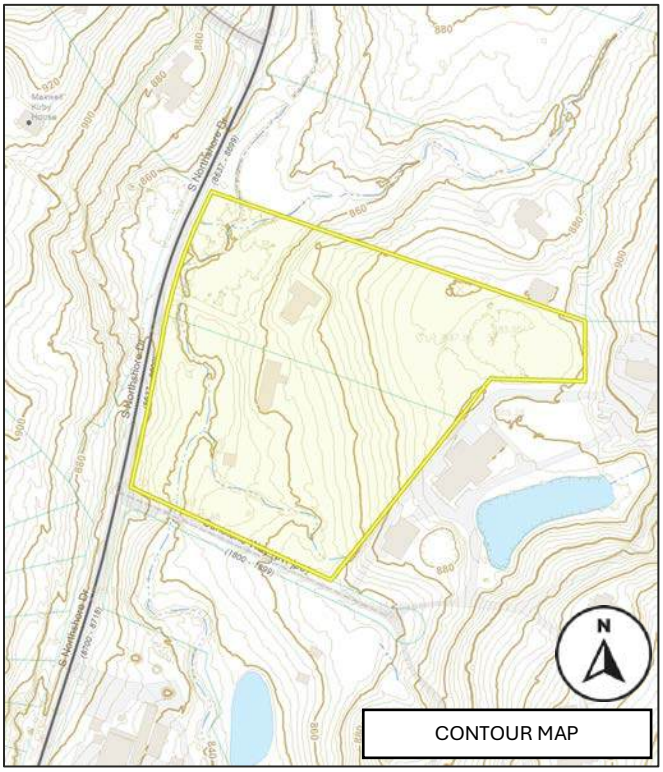
ENVIRONMENTAL CONSTRAINTS, FEMA MAPPING, TOPOGRAPHY, AND ILLUSTRATIVE EFFECTIVE DENSITY

OBSERVATIONS

- FEMA Flood Map identifies Zone AE (FLOODWAY), Zone AE (1% - 100 Year FLOODPLAIN), Zone X (0.2% - 500 Year FLOODPLAIN), and Zone X (Minimal Flood Hazard) and their respective adjacency to the Sinking Creek Stream on the subject parcels. *Existing SP overlay is shown on Comprehensive Plan Map in Exhibit B.
- Contour spacing indicates variable slopes across the site with ~30' of elevation change from the SW to NE corners.



FEMA FLOOD MAP



CONTOUR MAP

SOURCES

- KGIS exports printed Nov. 3, 2026.

GROSS ACREAGE VS. ILLUSTRATIVE EFFECTIVE DEVELOPMENT DENSITY

This independent study illustrates how the concentration of residential units may change when a fixed number of dwelling units is accommodated within progressively smaller portions of a property's gross acreage.

METHODOLOGY & ASSUMPTIONS

- Gross Site Area: 11.24 acres, representing the approximate combined acreage of the subject parcels.
- Assumed Unit Count: 134 dwelling units, representing an illustrative unit count based on the requested maximum zoning density of 12 dwelling units per gross acre.
- Illustrative Development Area: The assumed percentage of the gross site available to accommodate residential development, including residential lots or building sites, associated internal circulation, parking, and other improvements serving those units.
- Excluded Area: For purposes of each hypothetical scenario, the balance of the property is assumed to be unavailable for residential development. No specific acreage is attributed to floodway, stream buffers, topography, easements, or other constraints.
- Effective Development Density: The assumed number of dwelling units divided by the illustrative development area, expressed as dwelling units per acre.
- Calculation: Effective Development Density = Assumed Dwelling Units ÷ Illustrative Development Area.

ILLUSTRATIVE DEVELOPMENT AREA (%)	ASSUMED DEVELOPMENT AREA (AC)	ASSUMED DWELLING UNITS (DU)	ILLUSTRATIVE EFFECTIVE DENSITY (DU/AC)
100%	11.24 acres	134 du	11.9 du/ac
75%	8.43 acres	134 du	15.9 du/ac
50%	5.62 acres	134 du	23.8 du/ac
25%	2.81 acres	134 du	47.7 du/ac

LIMITATIONS

These scenarios are hypothetical and are not a site-specific development yield analysis. The percentages do not represent verified buildable acreage, and the assumed development area is not equivalent to building footprint, lot coverage, or a regulatory definition of net developable acreage. The calculations do not establish that 134 units can be accommodated on the property or that the County's gross-density calculation is incorrect. Actual development capacity would depend on applicable zoning and subdivision requirements, environmental constraints, site design, access, infrastructure, and subsequent approvals.

PLANNING RELEVANCE

The requested gross density establishes a potential entitlement, but it does not describe how development may ultimately be distributed across the property. Where significant portions of a site are constrained, the same theoretical unit count may require a substantially greater concentration of development within the remaining area.

This distinction is relevant to evaluating neighborhood compatibility, site planning flexibility, internal circulation, stormwater management, and whether the requested maximum density is appropriate for the property's physical characteristics.

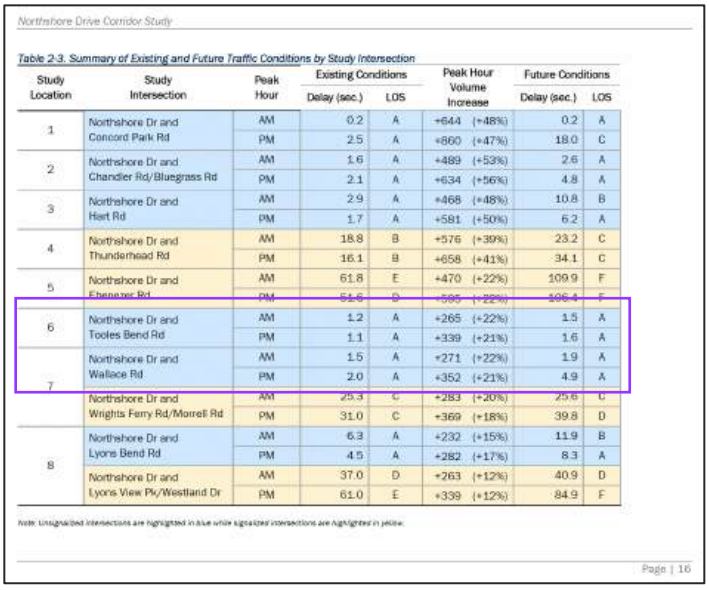
EXHIBIT D

NORTHSHORE DRIVE CORRIDOR STUDY, TRAFFIC COUNTS, CRASH RECORDS, AND TRANSPORTATION CONSIDERATIONS

OBSERVATIONS

- The subject parcel(s) is located on S. Northshore Dr. between Segments 5 and 7 and just NE of Segment 6.





Study Location	Study Intersection	Peak Hour	Existing Conditions Delay (sec.)	Existing Conditions LOS	Peak Hour Volume Increase	Future Conditions Delay (sec.)	Future Conditions LOS
1	Northshore Dr and Concord Park Rd	AM	0.2	A	+644 (+48%)	0.2	A
		PM	2.5	A	+860 (+47%)	18.0	C
2	Northshore Dr and Chandler Rd/Bluegrass Rd	AM	1.6	A	+489 (+53%)	2.6	A
		PM	2.1	A	+634 (+56%)	4.8	A
3	Northshore Dr and Hart Rd	AM	2.9	A	+468 (+48%)	10.8	B
		PM	1.7	A	+581 (+50%)	6.2	A
4	Northshore Dr and Thunderhead Rd	AM	18.8	B	+576 (+39%)	23.2	C
		PM	16.1	B	+658 (+41%)	34.1	C
5	Northshore Dr and Ebenezer Rd	AM	61.8	E	+470 (+22%)	109.9	F
		PM	54.6	D	+595 (+22%)	106.4	F
6	Northshore Dr and Tooles Bend Rd	AM	1.2	A	+265 (+22%)	1.5	A
		PM	1.1	A	+339 (+21%)	1.6	A
7	Northshore Dr and Wallace Rd	AM	1.5	A	+271 (+22%)	1.9	A
		PM	2.0	A	+352 (+21%)	4.9	A
	Northshore Dr and Wrights Ferry Rd/Morrell Rd	AM	25.3	C	+283 (+20%)	25.6	C
		PM	31.0	C	+369 (+18%)	39.8	D
8	Northshore Dr and Lyons Bend Rd	AM	6.3	A	+232 (+15%)	11.9	B
		PM	4.5	A	+282 (+17%)	8.3	A
	Northshore Dr and Lyons View Pk/Westland Dr	AM	37.0	D	+263 (+12%)	40.9	D
		PM	61.0	E	+339 (+12%)	84.9	F

Note: Unsignalized intersections are highlighted in blue while signalized intersections are highlighted in yellow.

Indicates approximate location of the subject parcels.

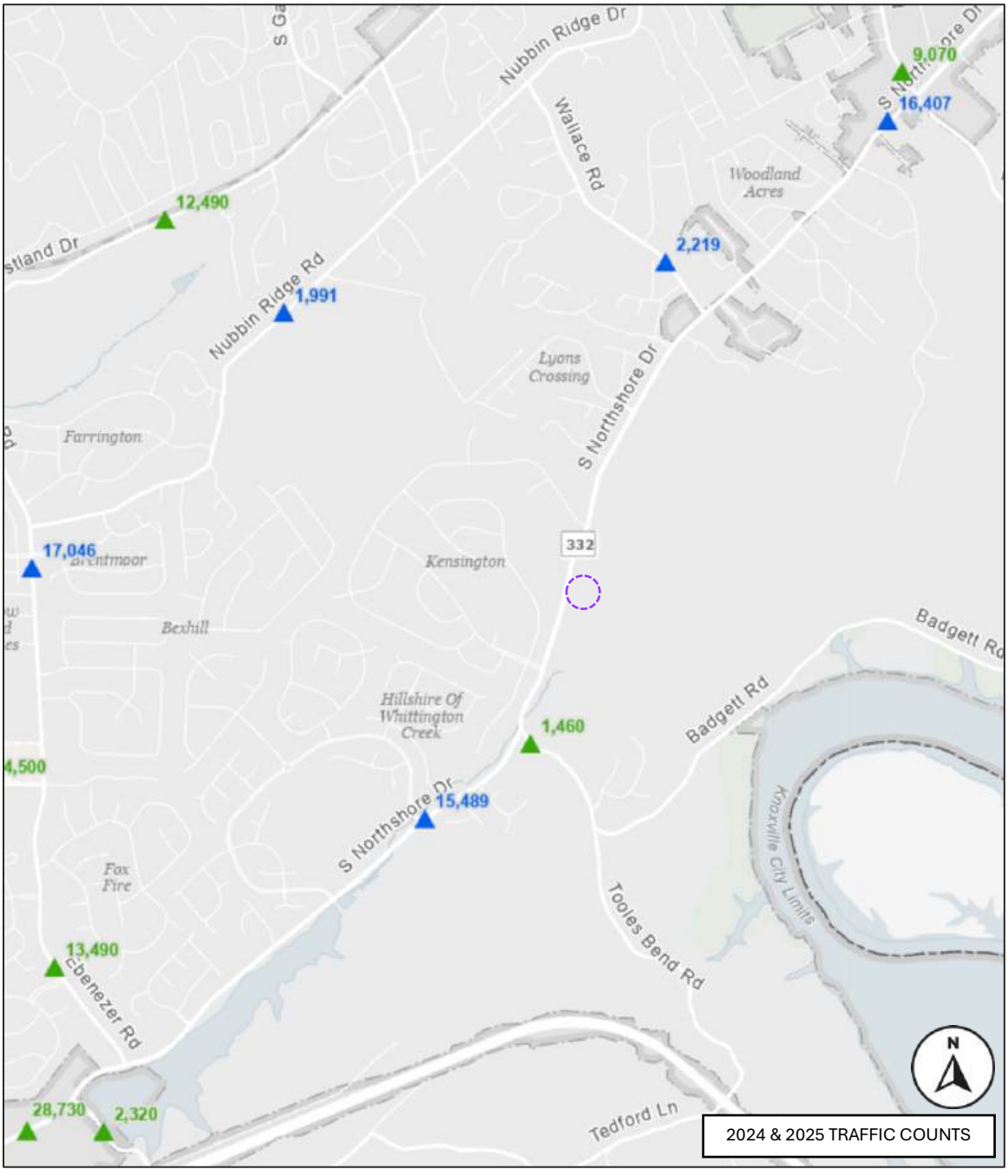
Indicates the two nearest studied intersections, both unsignalized.

SOURCES

- Northshore Drive Corridor Study – Final Report (2021), PDF p. 8 / printed p. 4; PDF p. 20 / printed p. 16.

OBSERVATIONS

- The subject parcel(s) is located on S. Northshore Dr. (SR 332).



Indicates MPC/TPO records from 2024. *Indicates TDOT records from 2025.*

Indicates approximate location of the subject parcels.

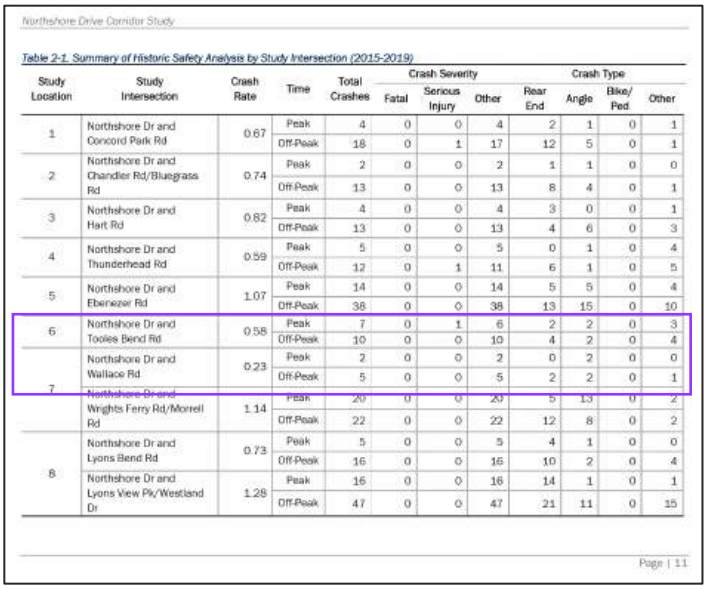
SOURCES

- KGIS exports printed Nov. 3, 2026.

OBSERVATIONS

- The subject parcel(s) is located on S. Northshore Dr. between Segments 5 and 7 and just NE of Segment 6.
- TPO Reported 330 Crashes on S. Northshore Dr. approximately between Ebenezer Rd. and Wallace Rd.

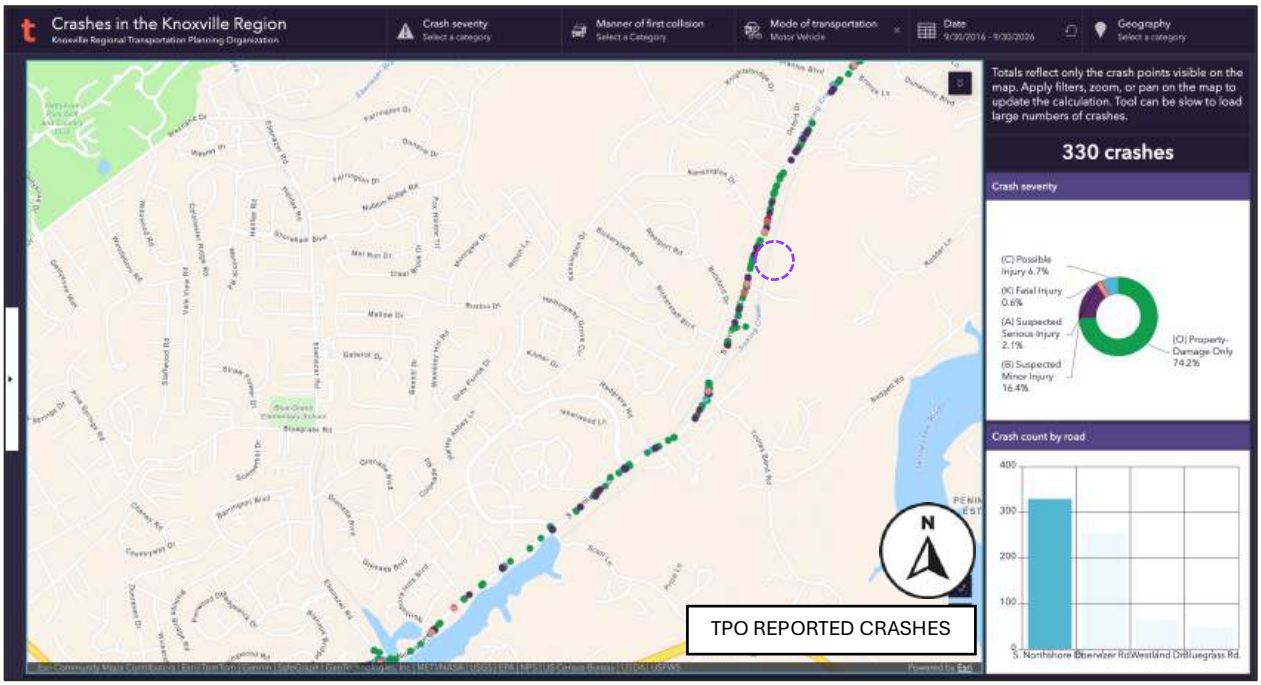




Study Location	Study Intersection	Crash Rate	Time	Total Crashes	Crash Severity			Crash Type			
					Fatal	Serious Injury	Other	Rear End	Angle	Bike/ Ped	Other
1	Northshore Dr and Concord Park Rd	0.67	Peak	4	0	0	4	2	1	0	1
			Off-Peak	18	0	1	17	12	5	0	1
2	Northshore Dr and Chandler Rd/Bluegrass Rd	0.74	Peak	2	0	0	2	1	1	0	0
			Off-Peak	13	0	0	13	8	4	0	1
3	Northshore Dr and Hart Rd	0.82	Peak	4	0	0	4	3	0	0	1
			Off-Peak	13	0	0	13	4	6	0	3
4	Northshore Dr and Thunderhead Rd	0.59	Peak	5	0	0	5	0	1	0	4
			Off-Peak	12	0	1	11	6	1	0	5
5	Northshore Dr and Ebenezer Rd	1.07	Peak	14	0	0	14	5	5	0	4
			Off-Peak	38	0	0	38	13	15	0	10
6	Northshore Dr and Tooles Bend Rd	0.58	Peak	7	0	1	6	2	2	0	3
			Off-Peak	10	0	0	10	4	2	0	4
7	Northshore Dr and Wallace Rd	0.23	Peak	2	0	0	2	0	2	0	0
			Off-Peak	5	0	0	5	2	2	0	1
	Northshore Dr and Wrights Ferry Rd/Morrell Rd	1.14	Peak	20	0	0	20	5	13	0	2
			Off-Peak	22	0	0	22	12	8	0	2
8	Northshore Dr and Lyons Bend Rd	0.73	Peak	5	0	0	5	4	1	0	0
			Off-Peak	16	0	0	16	10	2	0	4
	Northshore Dr and Lyons View Pk/Westland Dr	1.28	Peak	16	0	0	16	14	1	0	1
			Off-Peak	47	0	0	47	21	11	0	15

Indicates approximate location of the subject parcels.

Indicates the two nearest studied intersections, both unsignalized.



Indicates approximate location of the subject parcels.

SOURCES

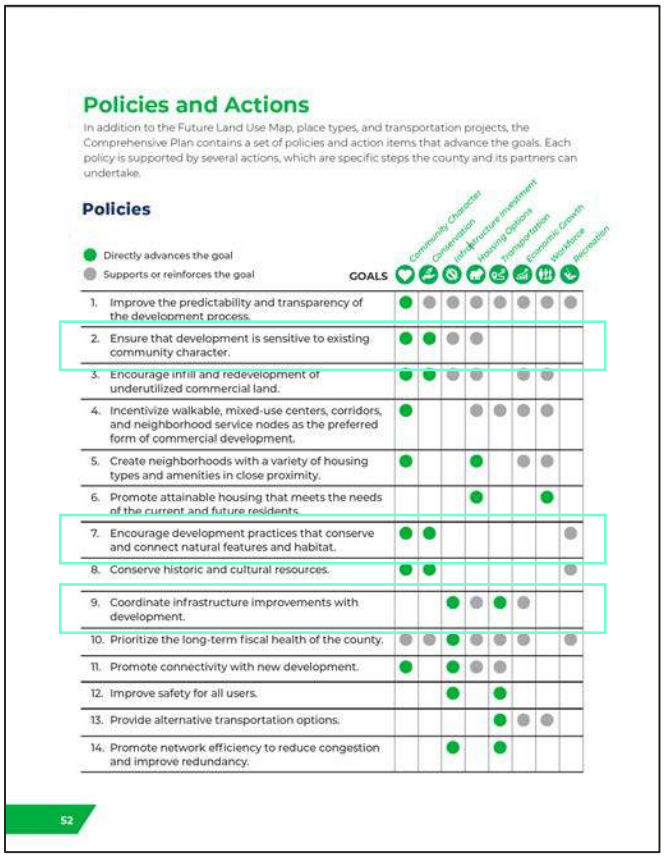
- Northshore Drive Corridor Study – Final Report (2021), PDF p. 8 / printed p. 4; PDF p. 20 / printed p. 16.
- TPO Crash Dashboard – as reported from 9/30/2016-9/30/2026.

EXHIBIT E

COMPREHENSIVE PLAN POLICIES AND ACTIONS

OBSERVATIONS

- Policy 2 — Community Character: Calls for development that is sensitive to existing community character. The requested SR designation and PR zoning at up to 12 du/ac represent a substantial departure from the surrounding lower-density residential and conservation-oriented land-use pattern.
- Policy 7 — Natural Features and Conservation: Encourages development practices that conserve and connect natural features and habitat. The property's stream corridor, mapped floodplain and floodway, and other physical constraints warrant consideration when determining an appropriate development intensity.
- Policy 9 — Infrastructure Coordination: Calls for infrastructure improvements to be coordinated with development. Actions 9.3 and 9.5 further emphasize directing growth toward areas served by adequate infrastructure and avoiding approval of developments where necessary infrastructure is inadequate or not planned. Existing roadway conditions and documented transportation concerns along Northshore Drive raise questions about whether the proposed increase in residential intensity is adequately supported by existing or planned infrastructure.
- Conclusion: As submitted, the applications raise substantial consistency concerns under Policies 2, 7, and 9. In particular, the proposed land-use transition, requested residential intensity, environmental constraints, and unresolved transportation considerations do not establish a sufficient basis for the requested Plan amendment and rezoning.



Policies and Actions

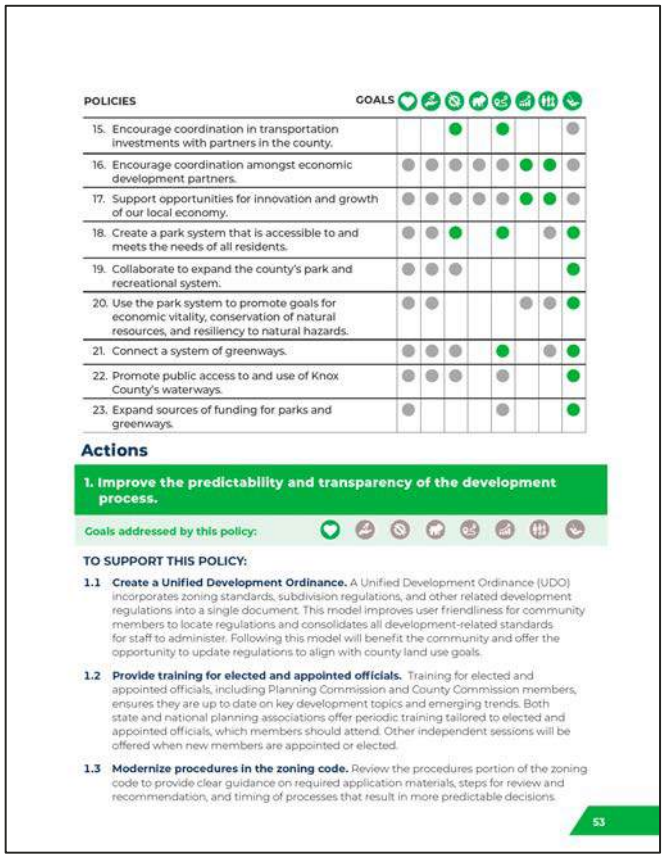
In addition to the Future Land Use Map, place types, and transportation projects, the Comprehensive Plan contains a set of policies and action items that advance the goals. Each policy is supported by several actions, which are specific steps the county and its partners can undertake.

Policies

Directly advances the goal
Supports or reinforces the goal

GOALS	Community Character	Conservation	Infrastructure Investment	Housing Options	Transportation	Economic Growth	Workforce	Recreation
1. Improve the predictability and transparency of the development process.	●	○	○	○	○	○	○	○
2. Ensure that development is sensitive to existing community character.	●	●	○	○				
3. Encourage infill and redevelopment of underutilized commercial land.	●	●	○	○		○	○	
4. Incentivize walkable, mixed-use centers, corridors, and neighborhood service nodes as the preferred form of commercial development.	●			○	○	○	○	
5. Create neighborhoods with a variety of housing types and amenities in close proximity.	●			●		○	○	
6. Promote attainable housing that meets the needs of the current and future residents.				●			●	
7. Encourage development practices that conserve and connect natural features and habitat.	●	●						○
8. Conserve historic and cultural resources.	●	●						○
9. Coordinate infrastructure improvements with development.			●	○	●	○		
10. Prioritize the long-term fiscal health of the county.	○	○	●	○	○	○		○
11. Promote connectivity with new development.	●		●	○	○			
12. Improve safety for all users.			●		●			
13. Provide alternative transportation options.					●	○	○	
14. Promote network efficiency to reduce congestion and improve redundancy.			●		●			

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POLICIES	GOALS
15. Encourage coordination in transportation investments with partners in the county.	
16. Encourage coordination amongst economic development partners.	
17. Support opportunities for innovation and growth of our local economy.	
18. Create a park system that is accessible to and meets the needs of all residents.	
19. Collaborate to expand the county's park and recreational system.	
20. Use the park system to promote goals for economic vitality, conservation of natural resources, and resiliency to natural hazards.	
21. Connect a system of greenways.	
22. Promote public access to and use of Knox County's waterways.	
23. Expand sources of funding for parks and greenways.	

Actions

1. Improve the predictability and transparency of the development process.

Goals addressed by this policy:

TO SUPPORT THIS POLICY:

1.1 **Create a Unified Development Ordinance.** A Unified Development Ordinance (UDO) incorporates zoning standards, subdivision regulations, and other related development regulations into a single document. This model improves user friendliness for community members to locate regulations and consolidates all development-related standards for staff to administer. Following this model will benefit the community and offer the opportunity to update regulations to align with county land use goals.

1.2 **Provide training for elected and appointed officials.** Training for elected and appointed officials, including Planning Commission and County Commission members, ensures they are up to date on key development topics and emerging trends. Both state and national planning associations offer periodic training tailored to elected and appointed officials, which members should attend. Other independent sessions will be offered when new members are appointed or elected.

1.3 **Modernize procedures in the zoning code.** Review the procedures portion of the zoning code to provide clear guidance on required application materials, steps for review and recommendation, and timing of processes that result in more predictable decisions.

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Indicates relevant written policies as located within the adopted Knox County Comprehensive Land Use and Transportation Plan.

SOURCES

- Knox County Comprehensive Plan (2024), PDF p. 56 / printed p. 52; PDF p. 57 / printed p. 53.

OBSERVATIONS

- Action 2.1: emphasizes appropriate transitions between differing land uses.
- Conclusion: The existing RC designation provides a logical transition between the more intensive SR/PR areas to the west and the RC/RL areas to the east, consistent with the transitional objectives of Implementation Action 2.1. Redesignating the property to SR would weaken this established transition and introduce a more intensive land-use designation adjacent to conservation-oriented and rural areas without a demonstrated alternative transition strategy.



2. Ensure that development is sensitive to existing community character.

Goals addressed by this policy:

TO SUPPORT THIS POLICY:

2.1 Update or create buffer or transition standards. Review the zoning code for regulations related to buffers or transitions between land uses and compare with regional, state, and national best practices. Update the regulations accordingly to support appropriate transitions between different land uses.

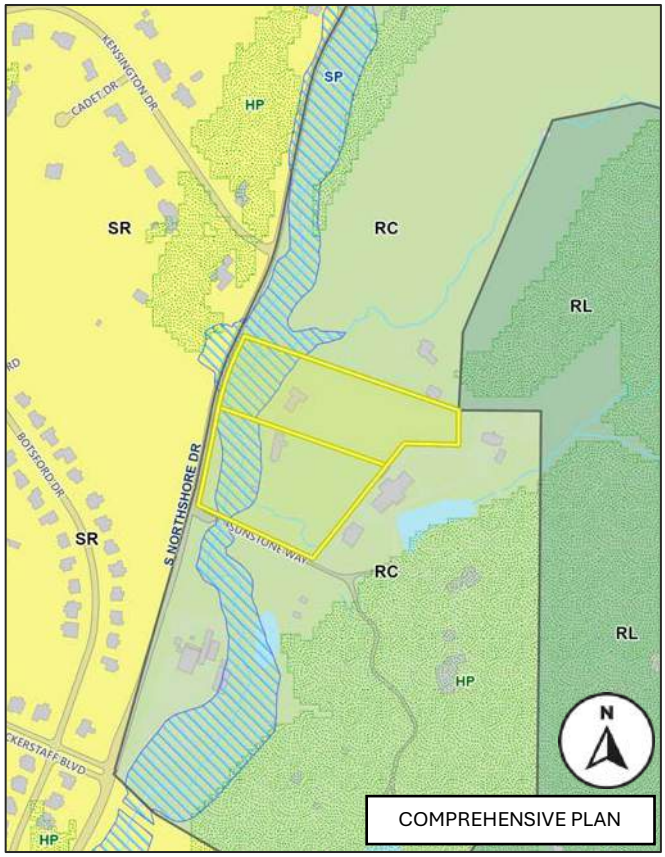
2.2 Update landscaping, lighting, and off-street parking standards. Assess current regulations in the zoning code for potential updates to the landscaping, lighting, and parking standards that improve the quality of development proposals. Identify updates that also improve the clarity of regulations and overall user-friendliness of the zoning code.

2.3 Provide protections for ridges, views, and open spaces. Perform analysis of these protections with the development review process to ensure ridges, rural vistas, and natural areas are being maintained and preserved for future generations.

2.4 Create standards to encourage preservation of open space. As the county grows, it is important to ensure that open space is integrated into significant new development and provided throughout the county. An update to the zoning and subdivision regulations shall evaluate minimum open space requirements and offer incentives for exceeding those minimums. Zoning incentives may include density bonuses or other design flexibility. The update to the regulations should consider establishing a uniform and comprehensive set of open space set-aside standards that are flexible and context-sensitive — based on geographical location and development type (new residential, mixed-use, or nonresidential development). The place type definitions provide guidance on open space percentages.

Preserved open space is private land on a development site that is set aside in perpetuity for the purpose of preserving environmentally sensitive lands, buffer areas, tree canopy, recreational lands, meeting or gathering places, and more. These lands can be maintained through a variety of tools—including, but not limited to, easements, covenants, dedication, conveyance of the lands to a third-party beneficiary, etc.

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Indicates relevant written actions as located within the adopted Knox County Comprehensive Land Use and Transportation Plan.

SOURCES

- Knox County Comprehensive Plan (2024), PDF p. 58 / printed p. 54.
- KGIS exports printed Nov. 3, 2026.

OBSERVATIONS

- Actions 9.3 and 9.5: Further emphasize directing growth toward areas served by adequate infrastructure and avoiding approval of developments where necessary infrastructure is inadequate or not planned.
- Conclusion: Existing roadway conditions and documented transportation concerns along Northshore Drive raise questions about whether the proposed increase in residential intensity is adequately supported by existing or planned infrastructure.



9. Coordinate infrastructure improvements with development.

Goals addressed by this policy:

TO SUPPORT THIS POLICY:

9.1 Reinstate the Capital Utility Project group to increase coordination. Solicit participation from the relevant county departments, Knox County Schools, utility providers, TDOT, Town of Farragut, and City of Knoxville, and convene regular meetings. Work together to align efforts, increase cost effectiveness, and minimize construction disruptions.

9.2 Plan in advance for future infrastructure expansion to support anticipated growth and use incentives where appropriate. The county, in partnership with TDOT, the TPO, and local utility providers, should understand needed infrastructure expansion and partner with the development community on the build out and/or right-of-way and easement dedication process where appropriate.

9.3 Focus growth in areas already served by adequate infrastructure. The Plan's Future Land Use Map locates place types partially based on current utility and transportation infrastructure availability or where infrastructure improvements are anticipated over the horizon of the Plan.

9.4 Require that infrastructure improvement agreements are in place before submitting a final plat application. Work with the private development community during plat review to identify the responsible party and establish a plan outlining infrastructure improvements to be made to ensure sensible growth.

9.5 Avoid approving isolated developments where infrastructure is inadequate or not yet planned. Rezoning of land, subdivisions, or development approvals should not be supported in these areas until improvements to major roads or utilities are complete or underway.

9.6 Align capital improvement projects. The Comprehensive Plan defines the county's intent for development character, infrastructure expansion, and land uses. County-funded capital improvement projects should be evaluated against the goals of the Comprehensive Plan to ensure they facilitate implementation and include investments across the county.

9.7 Establish typical road standards for collectors and arterials. The standards, which could prescribe right-of-way needs, lane widths, medians, shoulders, and other geometric features, can be used to establish cost shares and memoranda of understanding (MOU) with public agencies and private developers.

9.8 Establish biannual coordination meeting. Meet biannually with Knox County Schools leadership team, Planning, and the county to discuss development trends, school district needs, KCS and Knox County capital plans, and forcasted growth.

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Indicates relevant written actions as located within the adopted Knox County Comprehensive Land Use and Transportation Plan.

SOURCES

- Knox County Comprehensive Plan (2024), PDF p. 65 / printed p. 61.

OBSERVATIONS

- Action IM.6 — Plan Amendment Justification: Requires applicants seeking a Comprehensive Plan amendment to provide justification for the proposed change.
- Conclusion: The requested increase in residential intensity should therefore be evaluated against the property's existing RC designation, surrounding development pattern, environmental constraints, and available infrastructure before the amendment is approved.



Additional Implementation Actions

IM.1 Modify the process for plan amendments to support rezonings. Place types provide a degree of flexibility in terms of where they apply to specific sites and the specific types of development that are appropriate. However, there are inevitably instances where a property owner, or developer's wishes may be in conflict with the intent of this Plan. In that case, they will be required to request a plan amendment. That process should involve public input as part of the application prior to a public hearing.

The county or Planning Commission may initiate plan amendments at any time, but consideration of amendments from applicants is expected to occur quarterly.

IM.2 Provide ongoing staff training and continuing education opportunities. The Comprehensive Plan references many development concepts, programs, and policies. Staff should be supported in obtaining training to more effectively undertake the Plan's recommendations. Staff, Commissioners, and elected officials should conduct visits to other communities to observe examples first-hand.

IM.3 Prepare an implementation evaluation. On a regular basis, the county should review the Comprehensive Plan's accomplishments and effectiveness. This review should assess the Plan's actions listed in this chapter (completed, underway, ongoing, no longer relevant). A simple summary report could be prepared and shared with the Planning Commission that highlights progress and identifies potential plan updates.

IM.4 Update the State of the County report. On a regular basis, an update to the State of the County report (Appendix A) should be published. That report should compare changes that have taken place since this Plan's creation. A three- to five-year update interval may align with periods when new data are available from third party sources.

IM.5 Require staff reports to reference the Comprehensive Plan. All staff reports related to development applications, code amendments, rezonings, policy recommendations, annual work programs, and budgets will reference relevant Plan recommendations.

IM.6 Require applicants to reference the Comprehensive Plan. All requests to amend the Plan must provide justification for the changes as part of the application process.

Criteria for a plan update

If there is an obvious or significant error or omission in the Plan, or if two or more of the following criteria apply, it may be appropriate to update the Plan:

- Changes of conditions (such as surrounding land uses, zoning, uncontrolled natural forces/disasters, etc.)
- Introduction of significant new utilities or local/state/federal road projects that were not anticipated in the Plan and make development more feasible
- New data regarding trends or projections, population, housing conditions, or traffic growth that warrant reconsideration of the original Plan
- The proposed changes support the Policies and Actions, goals, objectives, and criteria of the Plan

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Indicates relevant written actions as located within the adopted Knox County Comprehensive Land Use and Transportation Plan.

SOURCES

- Knox County Comprehensive Plan (2024), PDF p. 76 / printed p. 72.