



*Building Homes, Enriching Communities, Changing Lives*

April 2, 2026

Honorable Board of Commissioners, Knox County  
**City County Building**  
Suite 603  
400 Main Street  
Knoxville, TN 37902

**RE: Knox County Unified Development Ordinance – Article 4, Draft Version 5 for Public Distribution-**OPPOSE****

Honorable Board of Commissioners:

The National Association of Home Builders (NAHB) is writing to regretfully oppose the Knox County Unified Development Ordinance-Article 4, Draft Version 5 and would like to ask for an opportunity with our colleagues at the Home Builders Association of Greater Knoxville to participate in the task to provide solutions and be at the table to find the appropriate path for this particular zoning issue. This potential ordinance, if passed, will hinder housing development in the county, increase the cost of housing, and jeopardize hard-working trades jobs in the greater Knoxville area.

The proposed requirements, while well-intentioned, would significantly hinder residential development across Knox County. Several provisions introduce new layers of regulation, design mandates, and procedural barriers that would slow the pace of construction and reduce the feasibility of many housing projects. As a result, the county risks creating a development environment that discourages investment and limits builders' ability to meet growing housing demand.

These constraints would inevitably increase the cost of housing for Knox County residents. When regulatory burdens rise, the cost of compliance is ultimately borne by homebuyers and renters. At a time when families across the region are already struggling with rising housing prices, this ordinance would push affordability even further out of reach. The average cost to purchase a new median home in Greater Knoxville is \$384,428. Further, one needs an income of \$106,059 to qualify for this median new home price. Currently, 60.82% of people living in the greater metro area cannot afford to buy a home. <sup>1</sup>

<sup>1</sup><https://www.nahb.org/news-and-economics/housing-economics/housings-economic-impact/households-priced-out-by-higher-house-prices-and-interest-rates>



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A lack of housing stock in each city or county increases the cost of housing but also hinders a local government's ability to generate tax dollars through property taxes that pay for local law enforcement, hospitals, and infrastructure projects like roads that assist in increasing lanes to combat traffic impacts, building sidewalks, parks, and bettering schools. With this proposal, housing development will cost more, making it costly for a builder to invest in any housing development projects.

When builders don't invest in a project, this leaves a long-term impact on a community, specifically on local trades professionals who rely on housing development for work. There are over 22 different trades involved in building a home. These hard-working men and women are your local roofers, carpenters, plumbers, electricians, drywallers, etc., who participate locally as constituents, taxpayers, and local consumers that help the ecosystem of the locality.

This proposal would rezone a certain percentage of developable land into categories prohibiting development of affordable duplex and townhome options, while also limiting density to levels below feasibility for single-family development. The impact of this rezoning would eliminate inventory and increase costs dramatically, reducing the ability of young people and families to obtain affordable housing in our community.

As a legal and land use matter, this proposal raises more than routine zoning administration concerns. T.C.A. § 13-7-101 authorizes counties to regulate land use, density, lot occupancy, and open space in unincorporated areas. However, those powers should not be used in a way that functionally downzones property without openly recognizing the consequences. When district changes, dimensional standards, minimum lot widths, or open space requirements reduce or eliminate the realistic development potential of land that is currently developable, the result is a substantive restriction on property use and housing opportunity, not a mere technical update. This concern is especially significant here because Knox County is using the UDO process and draft zoning map to implement the broader Advance Knox framework. This means the text changes are not merely technical revisions but may carry real parcel-level consequences across the county. For that reason, the County should carefully evaluate whether the UDO's requirements will convert land from agricultural but developable to effectively undevelopable, and whether those impacts are justified and consistent with the County's stated housing and growth objectives. With min lot size requirement being two units per acre, the lack of land availability can increase the cost of a home by 20-30%, and with typically national average of 13.7% for a finished lot, this can be higher when density is restricted, development regulations are higher,



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infrastructure requirements are high, and land availability is lacking.<sup>2</sup>

With these reasons, NAHB respectfully opposes the proposed amendments and asks that the proposed body include home builders at the table to ensure balanced solutions can be achieved for the greater good of Knox County.

Sincerely,

*Karl Eckhart*

Karl Eckhart, Vice President

NAHB, State and Local Government Affairs

*Zach Packard*

Zach Packard,

NAHB, Staff Counsel

CC:

House Representative Michele Carringer (District 16th)

House Representative Elaine Davis (District 18th)

House Representative Gloria Johnson (District 90th)

House Representative Justin Lafferty (District 89th)

House Representative Sam McKenzie (District 15th)

House Representative Dave Wright (District 19th)

House Representative Jason Zachery (District 14th)

Senator Becky Massey (District 6)

Senator Richard Briggs (District 7)

Orion Planning & Design

Unified Development Ordinance

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<sup>2</sup> [special-study-cost-of-constructing-a-home-2024-january-2025.pdf](#)