




WILLIAMSON COUNTY GOVERNMENT

MEMORANDUM

TO: Rogers C. Anderson, County Mayor
Williamson County Board of Commissioners
Williamson County Planning Commission

FROM: Mike Matteson, AICP, Planning Director 

DATE: March 4, 2020

SUBJECT: Response to HBAMT Letter of March 3, 2020

On March 3, 2020, staff received a letter from the Home Builders Association of Middle Tennessee (HBAMT) outlining their position regarding the proposed update to the Williamson County Comprehensive Land Use Plan. This letter was also shared with Mayor Anderson as well as members of the County Commission and Planning Commission.

Staff believes that the letter from HBAMT contains a number of inaccuracies and this memorandum is intended to address those points, which include the following:

1. The letter asserts that the Plan provides misleading growth projection numbers and specifically refers to the Plan as projecting 80,000 to 100,000 NEW homes in rural areas.

Response: The Plan is not misleading and the growth projections attributed to the Plan cited in the HBAMT letter are incorrect. The Plan projects, under the “Business as Usual” scenario, a TOTAL of 82,700 dwelling units in rural areas. This is including the approximately 25,000 dwelling units already located in rural areas. Therefore, the Plan projects that approximately 57,700 new dwelling units could be located in rural areas under current zoning and development policies.

2. The letter asserts that the growth projections don’t take into account reductions in densities that would occur under the traffic shed analysis or by taking into account natural constraints, such as floodplain, woodlands, etc.

Response: A detailed analysis of natural/environmental constraints was conducted and taken into account when developing the growth projections. Additionally, actual density figures for subdivisions developed under the current zoning ordinance were utilized in creating the assumptions that were used in developing the growth projections. In other words, the

assumptions used in developing the projections included a density figure that represents actual development densities achieved by approved subdivisions (which therefore reflect constraints, including those attributable to natural resources, traffic sheds, soils, etc.), rather than simply using 1 unit per acre in the assumptions.

3. The letter asserts that soil conditions in the eastern part of the County are extremely limited for septic or alternative sewer systems, and therefore limit density such that the growth projections cited in the Plan are inaccurate.

Response: While some properties are more limited than others from a soil suitability standpoint, the vast majority of major subdivisions developed in recent years utilize alternative sewer systems, which are not as dependent on suitable soils being located uniformly on a development site. Development densities for certain new subdivisions have been lowered for a number of reasons (traffic, natural resources, etc.) but staff does not recall a subdivision using an alternative system that was limited in density as a result of soil suitability. Further, the soils map that was provided in the HBAMT letter is a digital version of a portion of a state-wide soil survey that was developed in the 1960's. The soils survey is a generalized representation that cannot be relied upon to determine soil suitability on any given property. In any event, as explained in #2 above, actual density figures for subdivisions developed under the current zoning ordinance were utilized in the growth projections, which would account for any variations in soil suitability between development properties.

4. The letter asserts that a reduction in density to 1 unit per 5 acres would result in most new homes in the unincorporated County being priced above \$800,000, making it prohibitive for many people to purchase a new home here.

Response: Based upon a review of current new home listings, most new homes in the unincorporated County are already priced above \$800,000. By and large, affordable housing is not being provided in rural areas under the existing zoning of 1 unit per acre. The Plan's recommendations, which include encouraging growth at higher densities in the Urban Growth Boundaries, would result in more options for housing types and greater opportunities for affordable housing, not less.

5. The letter suggests that limiting growth in rural areas will result in a great under-utilization of the I-840 and HWY 96 corridors.

Response: These corridors are regional facilities designed to handle traffic from multiple counties and, in the case of I-840, across multiple states. The widening of HWY 96 is based on an existing need. Additionally, the vast majority of traffic generated in unincorporated areas will have to get to these corridors via County roads which were not designed to handle large amounts of traffic. As the Comprehensive Traffic Study demonstrated, if recent growth

trends continue, County residents will become increasingly dominant users of roads. The Plan demonstrates that reducing rural densities will result in a savings on necessary roadway improvement projects of \$110,000,000, and this is a conservative figure.

6. In the letter, the HBAMT requests that the boundaries of the Arrington and Rudderville Hamlets, which are proposed by the Plan to convert to Villages following the adoption of Special Area Plans for these areas, be expanded prior to the adoption of the updated Comprehensive Plan.

Response: Increasing the boundaries of these areas should not be done without a thorough analysis of the area and without involving property owners in the area. The idea behind designating these areas as Villages is to accommodate additional development. As such, it is anticipated that the boundaries of these areas will be expanded. But again, it would be a mistake to adjust these boundaries without involving affected property owners via a Special Area Plan process.

7. In the letter, the HBAMT requests that the Plan call for alternative sewer systems (STEP systems) to be utilized in Urban Growth Boundaries.

Response: The Plan recommends that the County partner with the municipalities to jointly plan for the UGB's. This will require a great deal of multi-jurisdictional coordination and cooperation. It would be a mistake for the Plan to call for using alternative systems in UGB's and doing so would be potentially harmful to these coordination efforts. However, discussion regarding this topic should take place, but as an outgrowth of the regional planning effort to take place after the adoption of the Plan.

