

## REPORT TO THE PLANNING COMMISSION

**MEETING DATE:** November 6, 2025

**SUBJECT:** Case #252346 - Ordinance 2025-11 - Memphis Light, Gas and Water Property Rezoning.

### **INTRODUCTION:**

- The subject property, located north of State Route 385 (SR385), south of Winchester Road, east of the City of Germantown, and west of Houston Levee Road. (see Exhibit 1), is owned by MLGW.
- Angel Bailey, on behalf of Memphis Light, Gas and Water (MLGW), has initiated this rezoning of six (6) separate tracts totaling 392 +/- acres from MPO: Medical- Professional- Office to RI: Restricted Industrial.
- The property is surrounded by other properties in the Town of Collierville zoned FAR: Forest – Agricultural – Residential, R-1: Low Density Residential, R-3: High Density Residential, and SCC: Shipping Center Commercial (see Exhibit 2). Adjacent Germantown zoning districts include R-E: Residential Estate and T5: Urban Center. A residential neighborhood to the north is zoned T-4: General Urban.
- Nearby developments include Gallina Centro Planned Development (PD), The Parke PD, and Ironwood PD. Residential Uses exist or are planned in some of the developments.

### **BACKGROUND:**

- A separate application for a Conditional Use Permit (CUP) is pending for electric production (solar) on the subject property.
- In 1999, approximately 370 acres were transferred from Gallina Richard A Etal to MLGW, and approximately 22 acres were also transferred from the State of Tennessee to MLGW, both by deeds recorded in the land records of Shelby County.
- Since the land transfer in 1999, the property has remained largely undeveloped, with ownership held by MLGW; however, an existing MLGW substation was built on the northern portion of the property.
- Electric production facilities are not permitted by right or with a CUP in the MPO zoning district. They are only permitted with a CUP in the RI and GI: General Industrial zoning districts under the classification of “gas or electric production or treatment facility”.

### **KEY POINTS: 1. The 2040 Land Use Plan designates the subject property as the “Green Corridor/Infrastructure” Place Type (see Exhibit 6 & 7).**

- The 2040 Plan also designates parts of these properties as the Green Corridor/Infrastructure Place Type (see Exhibit 6). The 2040 Plan says this Place Type is, “characterized by floodways, floodplain areas, regional and local greenbelt trail corridors, public parks, private open spaces, conservation land, areas along streams and creeks, and public utility sites (e.g. substations, wastewater plants)....As little development as possible should occur within Green Corridors and attempts should be made to cluster any development outside of these areas...Except for development associated with parkland or civic uses, development should be limited to non-intrusive changes designed to provide public access, where appropriate.” While this Place Type anticipates public utilities, industrial uses are not anticipated or appropriate in this area.
- The Town is currently in the process of preparing a new Comprehensive Plan which will create a new Place Type/ Future Land Use Map. This project, if approved, may help inform and guide

future land use policy regarding utility-scale solar development.

- RI and GI zones and uses are only appropriate in the Technology/Employment Center Place Type, which is not found along our western borders and is largely limited to our eastern borders and the Winchester Blvd Corridor.
- The existing MLGW substation on a portion of the subject property is related to energy production. This could be justification for the BMA rezoning the property to RI to allow an electric production facility through the CUP process. If the property is zoned RI and sold by MLGW to another entity, the zoning of the property would remain RI unless the BMA amends the Zoning Map allowing other industrial uses to be developed in this area out of character with the surrounding land uses.
- There could be a material adverse effect upon adjoining property owners from changing the zoning from MPO to RI if industrial uses other than solar farm occur at this property. The southern portions of the subject property are adjacent to an existing creek, limiting development potential for those portions of the site and providing a buffer along SR 385 and a portion of the City of Germantown to the west.

**2. MLGW submitted a non-binding conceptual site plan along with photo examples of solar panels and battery storage (see Exhibit 8).**

- The concept consists of the plans for solar panel placement but does not include placement for the battery storage system.
- At the site plan stage, staff will review the proposed as grading, fire safety plan, buffer, and setbacks.
- The height of, and ground cover under, the solar panels have not been specified.

**3. The southernmost portions of the subject property are impacted by the floodplain and floodway along Nonconnah Creek, limiting development potential on those portions of the site.**

- Water calculations and the need for detention will be evaluated for any development applications for the subject property.
- The Tennessee Department of Environment and Conservation (TDEC) will review the construction drawings as well before the permits are issued.

**4. Town water and sewer services are available to the subject property for the intended use, a solar farm. The impacts to these systems will be further analyzed during the site plan process if other uses are proposed.**

**5. Alternatives exist to rezoning the property for industrial uses, such as amending the Use Table in the Zoning Ordinance to allow for electric production facilities through a CUP in the MPO District or such uses could be allowed only in a renewable energy production overlay district.**

**STAFF RECOMMENDATION:**

Staff cannot recommend rezoning of the property to RI finding the uses are not appropriate in the Green Corridor/Infrastructure Place Type are inconsistent; however, given the property ownership and its longstanding substation, grounds may exist to rezone the property to RI since an electric production facility is currently not allowed in any other non-industrial zoning districts. If the PC has concerns over zoning this area RI, staff could develop an amendment to the Zoning Ordinance to allow electric production facility uses through the CUP process in MPO Districts. To minimize potential impacts to adjacent properties, special standards could be developed, such as minimum acreage sizes and enhanced buffering standards.

**NEXT STEPS:**

If the PC makes a recommendation on the rezoning, the BMA will consider the rezoning request on three separate readings, with the second reading being a public hearing. The tentative BMA meetings are 11/24/25, 12/08/25, and 1/12/25. The pending CUP will be considered at the 2nd or 3rd reading.

**ATTACHMENTS:**

[Exhibit 1 - Vicinity Map and Contact Information.pdf](#)

[Exhibit 2 - City of Collierville Rezone Letter 10-20-25 \(3\).pdf](#)

[Exhibit 3 - Existing Land Use layout.pdf](#)

[Exhibit 4 - Ordinance 2025-11 with Attchements .pdf](#)

[Exhibit 5 - Staff Analysis of Grounds for Amendment 9-22-25.pdf](#)

[Exhibit 6 - 2040 Place Type layout.pdf](#)

[Exhibit 7 - 2040 Land Use Plan - Place Type Excerpts.pdf](#)

[Exhibit 8 - Example Images Solar Battery.pdf](#)

[Exhibit 9 - Letter to ToC Regarding MLGW Rezoning CUP requests 2025.09.10 .pdf](#)

**PROPOSED MOTION:** To recommend approval of Ordinance 2025-11 (Exhibit 4).