Acknowledgments

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The East Tennessee Community Design Center appreciates the opportunity to develop this report on the findings from the Recode Knoxville Design Charrette and Design Standards Roundtable Discussion.

A full list of the charrette participants can be found at the end of this document.
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Introduction

Recode Knoxville started in 2017 as an effort to carefully evaluate and modernize the existing zoning codes, which had dictated the built form of the city without any major overhaul for nearly half a century. Through a collaboration of design and planning professionals and many public input meetings, drafts of the zoning map and code book were created and revised. As of January 2019, the fourth draft of the code book and the third draft of the map had been released for public input, and in an effort to test out the practicality and comprehension of the updates, an afternoon-long charrette was scheduled for February.

On Friday, February 1st, at the City Public Works Building, local architects, planners, developers, and students from Professor Marleen Davis’s third year Design Studio at the University of Tennessee’s College of Architecture + Design gathered together and formed six teams to study how the new codes affected six distinct sites throughout the city. The results from each team were presented at the end of the charrette and a public reception was held afterward that allowed one-on-one interactions with the designers to review the successes and failures of the new codes. The findings from the charrette can be found both at the end of the individual team sections as well as in the “General Conclusions” section of this document.

We hope that the results promote further consideration of Recode as it heads to City Council for adoption.
Goals

There were four main goals the charrette wanted to accomplish, which were dictated to all of the teams. Those goals were: to test the code and map with real world studies, determine if the code and map were in alignment with the collective vision for the city, explore how the code would shape the city, and assess the general usability and format of the code in order to provide comprehensive feedback to Knoxville-Knox County Planning.

Criteria

There were several criteria the teams were asked to consider in developing their sites. These criteria were given in order to resolidify the collective vision and desire for the future of the built environment in Knoxville, as well as to create points of consideration for the Planning Department to address upon the conclusion of the charrette. These criteria and recommendations were - in no certain order: to maximize density and tax revenue along corridors, create more urban conditions where appropriate, consider the public realm in projects, address transitions in scale at various zones, consider compatibility of new zones with existing contexts, address things such as complete streets and landscaping or buffer zones, consider the impact of transit routes on developments - and vice-versa - and consider the proximity and accessibility of housing to daily needs, including pedestrian access.

Assumptions

In order to have a more successful charrette - one that was efficient and allowed more focus on the general programming and massing of sites - the following design assumptions were made for each team during the afternoon.

• For parking, the minimum requirement was simplified for all zones to 3 spaces per 1000 Gross Square Feet (GSF) of building, with the exception of restaurants, which were allocated 8 spaces. As well, teams were able to reduce spaces to 2 per 1000 GSF if their site was within 1/4th of a mile of a transit stop.

• Parking was asked to be considered at 350 SF per space. This allowed for consideration of both travel lanes and landscaping areas as well.

• All buildings not marked as significant on the maps were allowed to be removed. As well, local streets and alleys smaller than collector roads were able to be altered or removed.

• Lot lines were allowed to be moved (parcels split or consolidated) if it helped the exploration of overall site development
TEAM 1
Fifth Avenue & Central Street
The Site

This site was selected because of the connection to Downtown Knoxville and the variety within the zoning transect, which ranges from the newly created DK-E (Downtown Edge) zoning to Commercial C-G-2 to Residential RN-3. It was the most ‘traditionally urban’ site of all sites selected, and was assumed to be the location where denser developments would fit in most naturally. It is arguably the least car-dependent site being studied.

This site allowed the team to use the proposed zoning changes to explore opportunities for a diversity of housing types, critique the compatibility of new development with the form and character of adjacent neighborhoods, and consider historic structures and overlays including Historic Knoxville High School, Emory Place, and the Fourth and Gill Neighborhood.

Historic Knoxville High School was the only structure in the study area that was required to remain.
Design & Conclusions

In their development of this site, Team 1 found that the newly created Downtown Edge (DK-E) zoning, which requires no off-street parking, was both helpful and restraining. They felt that it was particularly helpful in achieving the goal of added (and needed) density to land near downtown, whether in residential or commercial uses. However, they also felt that it would be harder to market to most local developers, as they would still bring with them the suburban, car-dominant mentality and would be uncomfortable, from a business-stance, developing a site without any parking. Though the team felt a large portion of needed parking could be attained from on-street parking, they acknowledged that this amount would be a large minority of parking at the most, especially if an intense retail site was to be developed here.

As well, the team found that the proposed zoning maps were severely lacking in well-placed transitions of zones from higher density and intensity to lower density and intensity. They felt that there needed to be more RN-4 zones to act as transitions from traditional RN-2 and RN-3 neighborhoods to the DK-E zones or other commercials zones such as C-G-2 and C-G-3.

Some other conclusions that were reached during this site study were:

• There needs to be a comprehensive plan (and perhaps a map overlay zone) that indicates structures or areas that the city would like to consider historic and would preferably renovate as opposed to destroy.

• There is potential for another overlay zone that deals with sites that could possibly be transit-oriented developments; such overlay zones would allow for special reductions in parking.
Legend

Yellow, Light: Lower Intensity Residential

Yellow, Dark: Higher Intensity Residential

Red: Commercial

Purple: Mixed-Use

Light Green: Open Space / Lawn Areas

Black: Roads and Parking Areas

Hatching: Existing Historical Buildings
TEAM 2
Bearden at Homberg
The Site

This site was selected as representative of a typical commercial corridor, in this case, along Kingston Pike in Bearden. The site transect includes a variety of interesting yet common zones and uses - from the open space zoning (OS) of Cherokee Country Club Golf Course and Highland Memorial Cemetery, to the RN-1 residential zoning of the Forest Heights Neighborhood to the commercial C-G-1 and C-G-2 zones in between them that surround Kingston Pike.

The team considered the proximity and accessibility of housing to daily needs, including pedestrian and transit access, the relationship of developments to Kingston Pike and internal streets, and the impact of allowable building heights on adjacent properties. They also addressed the 'stroad' character of Kingston Pike - a mix of high speed road and high access street design with multiple curb-cuts and large setbacks.
Design & Conclusions

In looking at this portion of Kingston Pike, Team 2 found that the proposed zoning is very conducive to creating the desired transition of zones from lower to higher intensities. On the northern side of Kingston Pike, below the single-family residential areas, the team proposed to have street-facing, mixed-use developments of two and three stories, with parking in the center of the block. Allowing for a minor change in the proposed zoning, the team was able to design a small pocket neighborhood to the northeast of these. Across the street, the zoning becomes C-G-3, which allows for unlimited height. This allowed the team to transition further to more intense developments of four, six, and ten story buildings as they moved closer to the railroad tracks at the southern end of the site. The team discussed the validity of a ten story building in this portion of town by noting that the building would not only act as a buffer between the trains and the rest of the corridor on the block, but that as the buildings stepped down in height gradually as they went north, the scale would not be overwhelming or feel out of place.

The team also created on-street parking along Kingston Pike in an effort to make it more of a safe pedestrian street and less of a ‘stroad’. They incorporated multi-family housing on adjacent blocks as well to help with the building scale transitions and sense of walkability. Parking was buried for the major development on the southern block. The team noted that with the proposed parking minimums, the associated costs for buried or structured parking would be something that would need to be prepared for if we want to move away from giant surface lots, even if those lots are hidden in the middle of a block.

The team felt that this site was generally well-suited for the goals of Recode in terms of creating higher densities, more walkability, and better zone transitions. However, the team also felt that parking requirements were still a major impediment, and that landscaping requirements, though clear for residential and residential-adjacent zones, needed to be written more clearly when regarding sole-commercial zones.
Legend

Yellow, Light: Lower Intensity Residential
Yellow, Dark: Higher Intensity Residential
Red: Commercial
Purple: Mixed-Use
Light Green: Open Space / Lawn Areas
Black: Roads
Grey: Parking Lots or Pedestrian Areas
TEAM 3
Parkridge at First Creek
The Site

This site was selected due to its strong historical importance including the Historic Parkridge Neighborhood, the Standard Knitting Mill building and the opportunity to engage with the new Industrial-Mixed Use zoning. The Team was asked to explore diverse programming opportunities, consider compatibility of a redevelopment the size of the four-story Mill building with local neighborhood form and character, and address the fragile nature of a large historic site such as this. They were asked to preserve some or all of the Standard Knitting Mill building.

This site was also requested through community input, and is a second good example of how the proposed zoning changes would affect traditional, walkable, inner-city neighborhoods near the heart of downtown. Being next to a large park and I-40 also allowed different contextual aspects to be considered during the design development that other Recode sites would not allow.
Design & Conclusions

In their attempts to save the historic Standard Knitting Mill, Team 3 felt that for a feasible and realistic proposal to do well with the given parking requirements outlined in the new code, a portion of the Mill would have to be demolished or converted into structured parking. This brought up the idea once more of an overlay for potential or preferred transit-oriented development sites, which would allow for a reduction in parking. This would be different than the reduction allowed in the proposed code, which only applies to existing transit-stops near a site.

The team realized that the Mill needed a road frontage and thus added a new road connecting north into historic Parkridge, west to Hall of Fame Drive, and south into Caswell Park. Multiple office buildings were added along this road frontage near the Mill to help hide parking from view. As well, an urban agricultural zone (perhaps a relocated Abbey Fields or another community garden) was placed alongside First Creek.

The team felt that the current continuation of the industrial zone behind some residences was antiquated and unnecessary. They suggested that it should be changed to a higher-intensity residential, such as R-4, to allow for a better transition from the neighborhood homes to the proposed office and mixed use developments on the historic commercial street.

A question that was raised during the exploration of this site was whether residences or other zones could create or use shared parking with a playground or park space, such as the one adjacent to the Mill and neighborhood. A critique was also mentioned that addressed whether sites like this one, which are near a major interstate and are close to other large buildings (and therefore somewhat ‘hidden’), should have special allowances for height, as opposed to the current zones, which are largely based upon existing and adjacent zones.
Legend

Yellow, Light: Lower Intensity Residential

Yellow, Dark: Higher Intensity Residential

Red: Commercial

Purple: Mixed-Use

Green, Light: Open Space / Lawn Areas

Green, Dark: Agricultural / Garden Area

Grey: Roads and Parking Areas

Hatching: Structure Above Surface Parking
TEAM 4
Burlington
The Site

This site was selected because of its connection with Magnolia Avenue and Martin Luther King Jr. Avenue (two historic commercial corridors in East Knoxville), its inclusions of RN-4 and RN-2 residential zones, and the Historic Burlington Commercial District. The team was asked to address the two commercial corridors and their different conditions (Magnolia being a much wider ‘stroad’ and MLK being a smaller local street), to consider engagement with area churches for the establishment of semi-public community and open spaces, to consider adjacency to the historic urban fabric of Cal Johnson’s Speedway Circle and Chilhowee Park, and to explore the ‘gateway’ / barrier character resulting from the Asheville Highway interchange to the direct Northeast. This site was also selected due to a community request.
Design & Conclusions

Team 4 found that, similar to the Bearden site, their site in Burlington naturally lent to an easy transition of low density zones on the edges to more intense developments in the commercial core. On the northern and southern ends of the site, single family housing was either retained or created. On the northern side of Magnolia, medium-sized office buildings were created to front the street, with the RN-4 zoning behind them allowing for the creation of new town homes. On the southern end of the site, the two existing churches were kept, though the question was raised as to why one was zoned Residential and another Office, and how that would affect the future uses of the buildings, should the congregations ever move or dissolve.

The middle block, in between Magnolia and Martin Luther King, Jr. Avenues, was developed in a way that removed the overly large, existing curved road and replaced it with a landscaped parking lot for two twin four-story mixed-use buildings that front both of the corridors.

Some issues that were raised during this site study were:

• There is a need for more organized on-street parking in certain parts of the city such as this site, and it is perhaps worth looking into creating a shared parking scenario with nearby on-street parking that could reduce the off-street requirements.

• For smaller historic commercial strips such as Burlington, a change of adjacent zones from General Commercial (C-G) to Neighborhood Commercial (C-N) seems to be more appropriate in regards to the allowed uses within those zones.
Legend

Yellow, Light:
Lower Intensity Residential

Yellow, Dark:
Higher Intensity Residential

Red: Commercial

Purple: Mixed-Use

Light Green:
Open Space / Lawn Areas

Black:
Roads and Parking Areas

Hatching:
Existing Historical Buildings
TEAM 5
Chapman Highway at Moody Avenue
The Site

This study site was selected as representative of a Commercial Corridor in South Knoxville. The site has a mix of higher intensity zones, including Commercial C-G-2 and C-G-3 (which has unlimited heights), and Residential RN-2, RN-4, and RN-5. The team was asked to address the ‘stroad’ character of Chapman Highway – a mix of high speed road and high access street design with multiple curb-cuts and large setbacks and consider maintaining the housing diversity that is already there. Currently the site provides a high number of low income apartment units that are easily accessible to downtown Knoxville. The team also considered conversion of Strip/Big Box development patterns into an urban, mixed use, transit-heavy corridor, as well as the historic interrelationship and transition from gridded, urban patterns to early garden suburban patterns. They were also asked to consider the unique topography of the site.
Design & Conclusions

Team 5 found that the unique topography of their site created a necessity for open spaces and green buffers that the code was unable to account for and that the map did not address. The western side of the site - where there is a large depression and are a few, somewhat isolated, residential parcels surrounded by commercial zoning - was made into a new park / open space to act as a buffer between the single family neighborhood and the large mixed-use developments up the hill along Chapman Highway. A commercial zone in between these two areas was changed into an RN-4 zone to aid in the zoning transition up the hill.

The team was able to push development of multi-story mixed-use buildings to the street edge of Chapman Highway, but due to the parking requirements and the desire to hide the parking in the center of the block, were also motivated to create large buffers of green space between the lots to break-up the 'sea of asphalt'. They also felt that the landscaping buffer requirements, especially when dealing with commercial zones abutting residential ones, were rather unclear.

The developers expressed concern about the goal of reduced curb-cuts along Chapman Highway and the need to hide parking, stating that they felt it would be harder for visitors not from the area to find parking. They also expressed concern that the more urban development pattern would harm the desire for drive-through restaurants, which are typically their most lucrative businesses.

Some other thoughts the team had based upon their design:

• The current low-income apartments (zoned RN-5) are the perfect spot for two or three story multi-family housing areas, though it would make more sense for this site to be a gradient of RN-7 down to RN-4 as it got closer to the RN-2 neighborhood on the east of the site.

• The apartment complex was also a good site to test out the new ‘pocket neighborhood’ design.

• The newly zoned RN-4 along the northern edge of Moody is good in principle, but both the designers and the developers felt that the topography was ignored when changing the zoning, and that due to the topography and parking requirements, building town homes there would be extremely difficult.
Legend

Yellow, Light:
Lower Intensity Residential

Yellow, Dark:
Higher Intensity Residential

Red: Commercial

Purple: Mixed-Use

Green, Light:
Open Space / Lawn Areas

Green, Dark:
Natural Areas / Buffer Zones / Trees

Black:
Roads and Parking Areas
TEAM 6
Merchant Drive at Clinton Highway
The Site

This study site was selected as representative of a commercial corridor in North Knoxville. The site is at the intersection of Clinton Highway and Merchant Drive. It is centered at the existing Knoxville Expo Center. This area allows for the study of Commercial Zones C-H-1 and C-H-2, alongside RN-1 residential areas and Office (O) Zones. The team was asked to consider conversion of Strip/Big Box development patterns into an urban, mixed-use corridor to help address the 'stroad' character of Clinton Highway (a mix of high speed road and high access street design with multiple curb cuts and large setbacks), and to consider open spaces and the need for community amenities. They were also asked to consider impact of allowable building heights on adjacent properties and ways to use the built environment / zoning to better transitions from the existing single family neighborhoods into more intense / urban developments along the commercial corridors.
Team 6 developed the site using the ‘Town Center’ approach by creating an open public space commonly found in the heart of a traditional town used for community gatherings. Around the Town Center they developed mixed use commercial areas that transitioned to higher density residential and then to single family that currently exists at the perimeter of the site. They concentrated on improving walkability by connecting a path between existing neighborhoods and the new pedestrian-friendly development. The new center would give residents access to commercial, residential, and office space within walking and biking distance, further reducing the need for vehicular access. They felt this site could be easily developed to allow for more options of multi-model forms of transportation, including public transit.

Some other thoughts that the team had based upon their design:

- CH-1 allowed office use, but didn’t limit the square footage as if it was zoned strictly O. That may be something that Knox Planning should confirm.

- CH-1 and other highway zones should address the number of and distance between entries and exits (curb cuts).

- They felt that parking was greatly reduced compared to current zoning, and still provided adequate parking spaces per SF of building.
Legend

Yellow, Light: Lower Intensity Residential
Yellow, Dark: Higher Intensity Residential
Red: Commercial
Red-Yellow Hatch: Mixed-Use
Light Green: Open Space / Lawn Areas
Black: Roads and Parking Areas
General Conclusions

Each team found site specific concerns during the course of their designs, as well as some more general concerns. The same was true of issues they felt were assets of the code and zoning map. The following is a list of some of the largest concerns and questions that some or all of the teams expressed at the conclusion of the charrette.

• There needs to be more gradual transitions between intense commercial zones and high intensity residential zones (RN4 and up), as well as more of these higher intensity residential zones in general

• Many parcels and sites are out of place with their proposed zones and need to be rezoned to better fit the context / transect

• How can we best zone certain specific uses (such as places of worship) so that their structures may be reused in a different way in the future without having to go through variances and rezoning? (Ex: Is there a way to build a church or mosque in RN-2 without the structure having to be RN-2 or Office? Should all religious structures and the like be Institutional? How does that affect things when the congregation moves or dissolves? Is it best for their reuse if they are zoned Commercial with special non-conformities? This would seem to allow for easy redevelopment into things like restaurants, hotels, etc, such as at Baker Creek Bottoms.)

• The code seems to be promoting the gradual transition from lower density residential into higher commercial (via high density residential and then low density commercial), but the map does not reflect where these changes have occurred. The reality of the zones on the map is inconsistent with the intent the code seemingly attempts to implement. It appears to be far too tied to the past zones that existed in the same areas.
• There is confusion as to the placement of C-G-3 zones. While the idea of having certain ‘nodes’ of higher density commercial is considered a good idea, the fear is that the placement of such zones – with their allowances of unlimited building heights – has the potential to create the ‘Atlanta-effect’ within Knoxville: numerous, seemingly random, clusters of massive towers with no transition to surrounding contexts. It is felt that the placement of these unlimited height zones needs to be better thought out in regards to their immediate context.

• The Commercial-Neighborhood zone is a tool that could be implemented more often on the map, especially in areas which are traditionally under four (4) stories in height and are surrounded by denser, historically walkable neighborhoods.

The following notes were mentioned specifically regarding landscaping:

• The current stipulation of one landscaping island every 15 parking spaces within a lot should be changed to require one landscaping island (with a tree) for every 10 parking spaces. This would allow shade coverage to most parking spots in a lot upon full tree maturation, greatly reducing heat-island effects.

• On the building use matrix (Table 9-1), consider adding a column that shows which uses require landscaping buffers between parking lots and buildings, as opposed to dictating it by zone. The current layout and dictation of buffers is hard to locate and understand.

• For both Class A and Class B buffer yards, the total percentage of shrubs and trees to be planted should be increased from a minimum of 50% to a minimum of 80-90%, if the true goal is to conceal the parking areas from other uses.
Charrette Participant List

To all of those that volunteered their time and knowledge to us - thank you. You helped make this charrette a success and provided insight into the proposed codes which we believe will have a direct impact in the future process of their continued development and adoption. Below are the individuals that signed up to work with us in this endeavor.

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*Landscape Architects Bill Bruce and Nathan Hunter served as advisors to all six of the teams*
Appendix: Design Standards Roundtable

On the afternoon of Thursday, February 28, 2019, a panel of Architects and Designers met at the Knoxville City Public Works Building to dissect and discuss the Design Standards sections of the proposed zoning code. The volunteers were given their choice to sit at one of four tables, with each table focused on different specific zoning areas. Each table had four to five volunteers. Table One reviewed Residential and Downtown Districts, Table Two reviewed Industrial-Mixed Use and Commercial-Regional-2, Table Three reviewed Commercial-Neighborhood and Office, and Table Four reviewed Commercial-General (2 & 3) and Commercial-Highway-2.

After an introduction and review of the meeting goals, the volunteers spent an hour at the break-out tables discussing the applicable sections of the code. Afterword, the attendees reconvened and a representative from each group presented their findings. Among the groups, there were several comments and suggestions that everyone agreed applied to the code in general.

GENERAL NOTES:

• As noted in the general conclusions section of this book, it was expressed that the Commercial-Neighborhood zone is under-used on the proposed map. This zoning would allow smaller, more appropriate development within traditional residential neighborhoods. It would aid in restoring the form of these areas to walkable districts with less curb cuts. Uses such as gas stations are not permitted and car repair businesses are possible upon review. This stipulation would allow these areas to regain their pedestrian-friendliness while allowing the flexibility for certain uses in the current auto-centric climate.
• Material restrictions were unpopular among those present as ‘any good material can be used badly and any restricted material can be used well.’ Many of the restrictions - such as ‘plastic’ - are vague in their definition and do not consider the wide range of materials made from plastic, nor the changing nature of architectural materials in this day and age. It is recommended that if the restrictions are not removed entirely, that they instead have much more specific definitions, as well as proper illustrative examples showing what is intended by the current listed materials.

• The building illustrations in the code book all appear in the same style and seem to be more confusing than helpful. The recommendation is to have pages within the various design standards sections of the book which show photographs of buildings of different styles that meet or do not meet the code. This could be solved with a simple green check or red ‘X’ next to the photograph. This would clearly allow the understanding of abstract concepts such as percentages of blank wall space or repetitious facade elements without the hazard of seeming to prescribe one style of architecture. This, again, could also work for material restrictions, to clarify how restricted materials may be granted variance if properly used.

• The standard for percentage of facade fenestration in many zones does not match the standard for energy efficiency. These standards needs to be reconciled.

• The design approval process needs to further develop the idea of having a ‘regular’ and ‘fast-track’ option, where a designer can get quicker approval by adhering to the design standards or have more freedom from standards while requiring more approvals and longer wait-time. As well, the approval committee needs to utilize Knoxville-Knox County Planning staff and at least one Architect.

• City of Knoxville officials should consider creating the position of City Architect to provide oversight and help interpret the design standards that are proposed in the new codes.
TABLE ONE: RESIDENTIAL & DOWNTOWN:

- For material restrictions in both residential and downtown districts, the inclusion of CMU on the list is rejected as it not only may be used well and appropriately, but is a material that many economically stressed residents have access to more easily than other materials; including it as a non-restricted material is therefore necessary to promote more equity throughout the city.

- For downtown material restrictions, T-111 and plastic are already not allowed per the IBC Fire District Codes.

- Metal sidings of all types should be allowed downtown.

- EIFS should be allowed in contexts where stucco is appropriate as a material; The Bijou is a prime example of this.

- For residential units, the specific angle requirements for front facades can be too restrictive; the facade should respond to the street on a case-by-case basis instead.

- The garage width maximum is considered a good standard.

TABLE TWO: INDUSTRIAL - MIXED-USE & COMMERCIAL - REGIONAL-2

- The general language and intent of these sections are approved of by the team.

- For I-MU, change the wording regarding facades from saying the elements must ‘repeat’ to ‘alternate.’

- For Commercial site design, parking should include beneath or within the building footprint.

- In regards to material restrictions: do not allow unfinished CMU, align the definitions of ‘vinyl’ and ‘plastic’ to meet with the building code, and allow more materials in the I-MU district.

- In CR-2, change max. height to 75’-0” to align with building code.

- In I-MU, the use matrix needs to be updated to allow for uses that would take place in or alongside single and multi-family structures, since those structures are allowed uses. This would include B&Bs, townhouses, and independent living facilities. Car washes should be allowed as well.
TABLE TWO: INDUSTRIAL - MIXED-USE & COMMERCIAL - REGIONAL-2 - Continued

• Parking structures as a primary use is a strange thing to allow in this district. Require them to be a mixed-use structure and address the street with a programmable space.

• Alleyways should be allowed to be developed in new construction.

• It is unclear as to whether the design standards apply only to new construction or if renovations are included as well.

TABLE THREE: COMMERCIAL - NEIGHBORHOOD & OFFICE

*The critiques for Standards 1 through 7 listed below apply to both zones*

• Standard 1: ‘no blank walls longer than 30’-0”’ is a fair standard, but it seems an arbitrary length and an explanation is required. This length should be contextual.

• Standard 2: facades with a ‘repeating pattern’ is fair and applicable, but the word ‘repetition’ causes confusion and should be changed. The language of this standard needs to better reflect that the intent is not about building design or materials, but about creating buildings with a human scale, especially on the ground floor. As well, the minimum wall projection depth of 2’-0” is too large and there is confusion as to how it relates to a 0’-0” setback line. This should be removed or clarified.

• Standard 3: ‘public building frontage’ should be better defined (what it is and where it is located).

• Standard 4: agreed as a good standard.

• Standard 5: ‘transparency’ needs better defined. It is unclear if the goal is simply fenestration to break apart solid massing on a facade or if it is to be able to see into the building. How do darkened and mirrored glass apply?

• Standard 6: 15% upper floor transparency is a good amount, but again, the word ‘transparency’ needs more clearly defined.
TABLE THREE: COMMERCIAL - NEIGHBORHOOD & OFFICE - Continued

• Standard 7 is agreed as a good standard.

TABLE FOUR: COMMERCIAL - GENERAL (2 & 3) & COMMERCIAL - HIGHWAY-2

• Restricting exposed concrete aggregate panels seems to be restricting an architectural style known as ‘Brutalism’ and severely limits the use of pre-cast concrete construction.

• ‘Vinyl’ should be better described as ‘residential-grade vinyl siding’ if it remains on the restricted list.

• There needs to be an investigation into (and perhaps additional section to the code book) showing cities where material restrictions have been successfully employed.

• Blank facades of a certain size (that are currently prohibited) can be aesthetically pleasing if the right material and context are used. This is another area where illustrative photographs of ‘what to do’ and ‘what not to do’ would greatly improve the code.

• The code needs to better define how alleyways are designed and governed over

• The intent of the code and the descriptions within are sometimes in conflict. Many areas need to be rethought and rewritten to better express the intent of the code as opposed to merely dictating a set of prescribed rules and regulations.

• It is critical for the success of the code, and for the map to reflect accurately the changes that the codes seek to employ, that the city residents understand that these changes are not permanent on day 1 of the new code and that if they exist in a zone that has changed, there are mechanisms in place to allow them to revert back to their (now-existing) zones at minimal cost to them.