



[MPC Comment] Comments Regarding Use on Review #6-F-18-UR (Mineral Springs Avenue)

1 message

Matthew <mhigdon99@gmail.com>
Reply-To: mhigdon99@gmail.com
To: commission@knoxmpc.org
Cc: lrider@knoxvilletn.gov

Mon, Jun 11, 2018 at 7:28 PM

Dear Commission Members,

Please accept the MPC Staff Recommendation regarding #6-F-18-UR and postpone consideration of this proposal.

My name is Matthew Higdon and I reside at [2811 Mineral Springs Avenue \(37917\)](#). I am writing to express my concerns and opposition to the "Use on Review" application brought by the Helen Ross McNabb Center, which is seeking approval to develop 50 apartments for seniors at [2704 Mineral Springs Avenue](#), currently zoned Office-1. The proposal calls for renovating an existing office building for 32 apartments and building a new 3-story apartment complex on the east side of the property with 18 units.

As explained below, the proposal is inconsistent with the East City Sector Plan, does not comply with standards for R-2 zoning, provides infrastructure and transportation challenges, and thereby, would adversely affect the residents and character of our small neighborhood.

Inconsistencies with the East City Sector Plan (2014):

My primary concern is that the apartment development of this size (with 50 dwelling units) is not suitable at this location because it conflicts with the current neighborhood character and land use. The 2014 Sector Plan identifies the planned use of our portion of Mineral Springs Avenue (the section east of the intersection with Whittle Springs Road) as low density residential. The three properties on the south side of the street currently zoned as Office-1 are generally consistent with the low density residential setting in their current use as medical offices/facilities.

This proposal would create a density on the property of *greater than 27 units per acre*, which the Sector Plan defines as a "high density" multi-dwelling residential development (see page 47). The residential and historic character of our street is clearly low density and primarily occupied by single family units on relatively large lots. The placement of *high density* residential housing on our street, in the middle of and surrounded by low density residential and office use is clearly inconsistent with the Sector Plan land use classifications.

The Sector Plan is explicit. The plan highlights the "Whittle Springs Corridor" as an "*Opportunity Area*" on page 28 and includes important objectives and recommendations for the corridor that includes Mineral Springs Avenue, including:

"Retain the low density residential character in the adjoining neighborhoods."

Notably, the plan also states that past development along the corridor has occurred in a pattern that provides neighborhood stability which "*needs to continue*." The plan goes so far as to recommend that R-2 areas near our street be rezoned to R-1 to ensure the low density character of the neighborhood. The McNabb Center proposal is clearly inconsistent with this recommendation.

The location criteria identified in the Sector Plan for high density residential states that such development belongs on "*major collector and arterial streets, adjacent to regional shopping and major office districts...*"

and “*along corridors with transit and sidewalks.*” The location criteria for medium density residential states that projects should be “*along corridors that are served by or proposed to be served by transit*” and recommends sidewalks. Because our portion of Mineral Springs Avenue is classified as a “local” street, the McNabb Center apartment development clearly fails to meet these criteria.

Our street does not have suitable public transit or sidewalks for such a development, especially for seniors that may have limited transportation options. The location is on a hill, along a narrow local street, and several blocks from the nearest bus stop. The local commercial areas along Broadway are not close enough for many seniors to walk and there are no sidewalks available (without substantial detours). It is also unclear whether emergency service vehicles can adequately come and go from the proposed facility or the fire lane.

The Sector Plan recommendations and location criteria are evident when reviewing the Sector Plan Planned Use Map (page 24), which *clearly* illustrates the intent to preserve the low residential character of our street and the Whittle Springs Corridor, and to concentrate medium density residential along collector streets near our neighborhood, primarily along Valley View Drive to the east. There is no location on this map that where a high density residential development is planned on a small parcel surrounded by low density residential areas because such land use decisions are clearly undesirable to citizens, property owners or the planners who work to identify ways to improve our communities.

Inconsistencies with the Zoning Ordinances for R-2:

The fact that this location is not suitable for a 50-unit apartment development is evident when you consider that the proposal does not meet the General Description for R-2 districts or the basic standards for the district.

First, the General Description of the R-2 district in the Code of Ordinances states that “*This is a residential district to provide medium population density. The principle uses of land may range from houses to low density multi-dwelling structures and developments.*” This proposal would establish a *high density* use in the middle of a low density (other residences along our street are RP-1, also a low density use zone), which is clearly inconsistent with the description of an R-2 district.

Preliminary drawings provided by the Helen Ross McNabb Center to Mineral Springs residents reflect a proposal that does not have enough parking spaces, does not meet the open space standard, and fails to meet the “intensity of use” standard. While MPC may choose to waive these standards and approve the proposal anyway, I ask the MPC to consider whether waiving *three* key standards is appropriate given that MPC is already being asked to consider a use of the property that differs from its current land use zone designation. I understand why waiving some standards may be necessary when a similar project is planned in an R-2 zone, but it seems an applicant that wishes MPC to consider a “Use on Review” at a location that has a different zoning designation should meet each of the basic standards.

Regarding the “intensity of use” standard, the McNabb Center’s architects informed residents that this project complies with this standard and will likely make the same claim before MPC. However, please note that only by “rounding up” the size of the lot do they meet this standard. The lot is identified on kGis.org as being 1.85 acres in size, yet the applicant has used the more convenient 1.9-acre figure. Without rounding up, they do not meet the standard. The fact that they need to do this to meet the “intensity of use” standard exemplifies how tightly packed they would place apartment units into the 1.85-acre lot.

Regarding the parking standard, while it may be true that a senior living facility may not need 1.2 spaces per unit, it should be noted that our street is very narrow and if this lot ever fills, it’s likely that visitors would park along the street. This would be very problematic and inconvenient to residents because the street is so narrow. The Helen Ross McNabb Center’s assertion that their residents would not need more parking only reinforces the importance of adequate transit and sidewalk options for residents of the facility, of which there are none on our street.

The extent to which the proposal fails to meet open space requirements is troubling as well. Anyone who drives by the Northgate and Love Towers (Old North Knox) can attest to the number of residents who enjoy

open space and spend time out-of-doors. These residents enjoy ample open areas, picnic tables, benches, walking paths, and even community gardens. At the proposed site, residents would be confined to small backyard with a pavilion.

Design of New Building and Other Concerns

Residents of Mineral Springs Avenue are also concerned about other aspects of the proposal. The design of the current Associated Therapeutics building has always been inconsistent with the architecture of residences on the street, contrasting negatively with the traditional rancher, single-level homes along the street, as well as with the two other office buildings, that are attractive, red brick, colonial style structures. Under their proposal, a 3-story building similar in design to the Associated Therapeutics building is proposed. We have been told that the new building would also have cream-colored walls and an ugly, bright green/teal/turquoise colored metal pitched roof. The contrast in style would be most evident if the building is placed just feet from the traditional brick, single level rancher that will be next door to the east.

More concerning to me is the contrasts that would be created by having a three story structure in the middle of the neighborhood. Most residences along the street are brick ranchers and the three stories of the proposed building greatly conflict with the character of the residences. The relatively consistent roof lines along the street, when viewed driving up the street, would be disrupted by the three story structure (made worse by its pitched metal turquoise roof). The City's General Plan, Sector Plan and every design guidance document produced by the MPC and City for developers all emphasize appropriate design principles to avoid such contrasts and unappealing development.

It is also apparent that the Landscape Plan created by the Allan & Associates firm do not accurately show the location of several large trees that would act as visual buffers to the new 3-story building. The fire lane is shown setting between the trees but in reality, the trees have been misplaced in the drawing and would likely require removal.

Other concerns include uncertainty regarding how the construction would occur without creating challenges for residents; the street on the east side narrows *sharply* just above and east of the entrance to the Associated Therapeutics property. With construction on the east side of the property, it is unclear if there is enough room for work there without blocking the residences to the east. This is a dead end road and travel may be impacted.

With the narrow street, we also question the ability of emergency services to serve the apartment complex in the case of a health emergency or fire (note, all residents of our general area hear the frequent sirens en route to Northgate Tower on a daily basis). According to preliminary drawings, it is questionable whether fire engines can turn adequately out of the parking lot to travel up the road (eastward) toward the dead end. It is likewise questionable whether a large fire engine can adequately turn into the proposed fire lane, given that the width of the road at that location is only 17.5 feet. This should be reviewed.

In addition, the sidewalks proposed in the design are nice, but they go nowhere! The lot is on a hill and there are multiple utility poles in the middle of the drawn sidewalk, limiting the use for people using walkers or those in wheelchairs.

In conclusion, please postpone consideration until these issues are resolved.

I urge the MPC to carefully consider the intent of the City, planners, and residents involved in developing the Sector Plan. The Sector Plan strongly supports my position that low density residential areas along Whittle Springs Road should be retained and that high density residential should be located elsewhere. The McNabb Center's proposal clearly does not meet the basic description or standards of the R-2 district. And our street is unsuitable to meet the transit needs of seniors.

I admire the work and contributions to our city and region that the Helen Ross McNabb Center and their staff make. I think a senior living facility with fewer units would be acceptable to most residents in our community, at a medium density residential level. This might be done by abandoning the new construction altogether and

simply renovating the current building. Residents are used to the current building and would generally welcome these 32 residents into our neighborhood. Reducing the number of units would resolve the inconsistencies with the plans and with the Code of Ordinances.

Thank you for considering my comments. I request that you postpone this proposal until the July meeting, as recommended by MPC Staff, so that the problems can be reviewed more closely.

Regards,

Matthew Higdon
2811 Mineral Springs Avenue
Knoxville, TN 37917

--

This message was directed to commission@knoxmpc.org



Betty Jo Mahan <bettyjo.mahan@knoxmpc.org>

[MPC Comment] proposed senior living facility by Helen Ross McNabb on Mineral Springs Avenue (#6-F-18-UR)

1 message

'Allen Smith' via Commission <commission@knoxmpc.org>
Reply-To: agsmith008@yahoo.com
To: "commission@knoxmpc.org" <commission@knoxmpc.org>

Mon, Jun 11, 2018 at 7:06 PM

It is my understanding that the above referenced project will come before MPC this week. The drawings that I have seen look to me to be incorrect. I respectfully request that you delay any vote on this project until some of the questions that the neighbors have can be resolved.

Allen G. Smith
2802 Mineral Springs Avenue
Knoxville TN 37917
, TN 37917

--

This message was directed to commission@knoxmpc.org