



Laura Edmonds &lt;laura.edmonds@knoxplanning.org&gt;

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**[Planning Commission Comment] Recode- Industrial Height increase**

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**Deborah Thomas** <deb33immel@gmail.com>

Wed, Jun 12, 2019 at 11:44 AM

Reply-To: deb33immel@gmail.com

To: Gerald Green &lt;gerald.green@knoxplanning.org&gt;

Cc: Will Johnson &lt;wjohnson@knoxvilletn.gov&gt;, commission@knoxplanning.org

Dear Gerald,

Regarding #25, Article 6. Industrial Districts, page 6-1, Section 6.3 and Table 6-1. Council initiated change for **"Increase 'Maximum Building Height for I-G and I-H to 90'**. Staff will make changes in the document.

The change was approved at City Council workshop on 5/30/19. Lauren Rider requested there be step-back height requirements similar to commercial step backs when properties abut residential. Please see that the additional language is included with the height increase for industrial zoning. The language from the December draft used for commercial abutting residential is "however, structures must set back an additional 1' for every 2' of height over 45' from any required setback abutting a residential district lot line".

Setback requirements are crucial for inner city neighborhoods that abut industrial zoning and don't have commercial properties as buffer zones. This impacts areas in Oakwood-Lincoln Park, Old North, Lonsdale, Parkridge, and Alice Bell among others.

Thank you for your attention to details throughout this lengthy public process.

Deborah Thomas  
428 E Burwell Ave  
Oakwood

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This message was directed to [commission@knoxplanning.org](mailto:commission@knoxplanning.org)



Laura Edmonds &lt;laura.edmonds@knoxplanning.org&gt;

**[Planning Commission Comment] recommendation on Hillside Protection Overlay**

1 message

Jennifer Roche &lt;jennifer@kaarmls.com&gt;

Tue, Jun 11, 2019 at 9:56 AM

Reply-To: jennifer@kaarmls.com

To: commission@knoxplanning.org

Commissioners:

I would like to bring to your attention a major change in the current draft of Recode Knoxville. At its May 14 workshop, City Council voted to expand the Hillside Protection (HP) overlay to all properties, both residential and commercial. Currently, the HP Overlay is only applied on residential development. KAAR brought up a multitude of issues with this expansion at City Council's May 30 workshop:

**1. Recode is not the place to make sweeping changes to stand-alone ordinances:**

- the HP Overlay was not in Recode's stated purposes, the Technical Report, or the 1st Draft
- the Stakeholder Committee did not touch the HP Overlay because of the very public understanding that it would be codified in its current form (as it is currently implemented on residential development)
- no other stand-alone ordinances are being drastically changed as part of the Recode process (Sign Ordinance, Parking and Landscaping Ordinance, Cumberland Ave, South Waterfront)
- the HP Overlay went through a lengthy public vetting process that resulted in it not being codified and only being used on new residential developments
- the HP Overlay only applied to residential property in the first draft and was changed to apply to all property in later drafts, against city staff recommendation: "Applying the maximum land disturbance areas across the board to any property with the HP overlay is a significant change to the previous draft and has not been vetted publicly."

**2. The HP Overlay has not been vetted with regard to Recode design standards on commercial properties:**

- the Design Charrette did not address the HP Overlay in its commercial development exercises, likely due to the understanding that it would not apply
- when the HP Overlay went through its public process 5+ years ago, it was vetted against Knoxville's zoning code at that time; it has not been vetted against Recode standards or the Recode map

**3. There are too many unknowns in regards to expanding the HP Overlay to commercial, office, and industrial properties:**

- it is unknown how many acres of developable land will be lost if the HP Overlay is expanded to commercial, office, and industrial zoned properties
- it is unknown how the HP Overlay will interact with Recode design standards on commercial, office, and industrial zoned properties
- a brief analysis of parts of the current Recode map shows that expanding the HP Overlay could make large stretches of property, some with existing blighted structures, undevelopable along the I-275 corridor
- there are concerns that the topographical map used to enforce the HP Overlay isn't updated to accurately reflect current land conditions
- as the Recode map changes, the effects of an expansion of the HP Overlay on commercial, office, and industrial properties changes, making it extremely difficult to assess the real implications of an expansion of the HP Overlay during the Recode adoption process

**4. Any changes to the HP Overlay should be made outside the Recode process, after it is adopted:**

- because of all the concerns above the only way to make thoughtful and informed decision on if/how to expand the HP Overlay is to do that after Recode has been adopted, possibly being vetted through the Stakeholder Committee process

**RECOMMENDATION:**

**KAAR supports thoughtful and informed developments and requests Knoxville/Knox County Planning make a recommendation to City Council that the HP Overlay be codified as it is currently being used by city staff (with language that represents how it is currently implemented on development).** I believe this would be going back to draft #2 (July 2018) language (see below) but this would need to be confirmed with Gerald Green and his staff.

**8.4 HP HILLSIDE PROTECTION OVERLAY ZONING DISTRICT**

**A. Purpose**

Hillsides constitute significant natural topographic features of the City. In addition, when development occurs on hillsides, there are potential serious consequences, such as increased erosion, fire, or flood hazards, and property damage from extensive soils slippage and subsidence. In order to protect hillsides and hillside development, the HP Hillside Protection Overlay District is established.

**B. Applicability**

These regulations apply to lots that are zoned residential within the HP Overlay District.

**C. Density and Land Disturbance Limitations**

Table 8-1: Density and Land Disturbance Limitations establishes the maximum residential density and maximum land disturbance of the site for residential districts that are within the HP Overlay District. All other dimensional regulations apply unless specifically modified by the HP Overlay District.

Table 8-1: Density and Land Disturbance Limitations		
Percent of Slope	Maximum Density	Maximum Land Disturbance
Less than 15%	6 du/a	100%
15% up to 25%	2 du/a	50%
More than 25% up to 40%	0.5 du/a	20%
More than 40%	0.2 du/a	10%

**D. Site Plan Review**

All development of lots that are zoned residential within the HP Overlay District are subject to site plan review per Section 15.5.

I will be at the agenda review meeting and at the meeting on Thursday to speak to this topic and answer any questions you may have. Please feel free to contact me via email or cell phone as well.

Thank you,  
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This message was directed to [commission@knoxplanning.org](mailto:commission@knoxplanning.org)