

I am writing as chair of the Knox County Planning Alliance. KCPA has not taken a position on the stadium proposal, but we are concerned about the magnitude of the requested exceptions to the underlying zonings design standards. Particularly, the requested exceptions for lighting and signage are substantial.

As an example - the most concerning item is the requested modification of 13.2 - Prohibited Signs, which strikes through a number of prohibited sign types. This potentially allows a Master Sign Plan to contain signs such as billboards, and an applicant to argue that since billboards were removed from the prohibited signs standard, therefore they are within their rights to submit a billboard facing external roads such as James White Parkway or Interstate 40. We don't think this is the intent, but the guardrails are removed with the requested exceptions.

The applicant has requested exceptions / relief from submitting the lighting plan and landscaping plan during the Planned Development - Final Plan review phase for Planning Commission. Instead these would be submitted to staff as part of the permitting process, and thus not subject to public and Planning Commission review and comment. Since a number of design exceptions are requested, it seems more important than every to have those publicly reviewed, especially with the visibility and prominence of this development.

KCPA has learned that the wording of approvals, exceptions, and approvals is very important, because the written wording is what staff, applicants, and the community have to rely on.

This is a unique project of substantial size, requesting a number of exceptions to the ordinance. To give citizens and legislators additional comfort, it would be helpful for the large exceptions to be reviewed by City Council as well as Planning Commission. KCPA suggests that staff recommendation #3 be amended (new text in **Bold**):

3) Landscaping plans (Article 12), a master sign plan (Article 13.7), and a lighting plan (Article 10.2) shall be submitted with the final planned development application per their respective articles in the zoning ordinance **or prior to application for building permits, where they will be heard as a Special Use item at Planning Commission.** <following needed if special use cannot normally be appealed to City Council **With the magnitude of the the design exceptions requested, an avenue for appeal to City Council of the Planning Commission Special Use hearings for the Landscaping Plan, Master Sign Plan, and Lighting Plan is explicitly provided.**> ~~unless an exception has been requested and approved as part of the Alternative Landscaping Plan review process (Article 12.2.D), the Master Sign Plan process (Article 13.7), and/or as part of this Planned Development process.~~

Thank you for your consideration. We appreciate the detailed work that the applicant has gone through, and that Planning Staff have done in getting this application to this point. We understand that certainty is not possible at this early phase of the project, but we believe that can be balanced by additional public and Planning Commission review with more detailed designs.

Sincerely,

--Kevin

Kevin Murphy, Chair  
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