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August 5, 2024

Knoxville-Knox County Planning Commission
400 Main Street
City-County Building Room 403
Knoxville, TN 37902

**Re: Overlook Owners Association Appeal
Opposition – 8-A-24-OB**

Dear Planning Commissioners:

I am writing on behalf of the Overlook Owners Association and other concerned citizens who strongly oppose the proposed parking garage and apartment building project by Hill & Locust Partners. This project contradicts the spirit and goals of the Knoxville Downtown Design Guidelines and threatens the continued revitalization of our city. We believe Knoxville deserves better.

The Knoxville Downtown Design Guidelines, adopted in 2007, were established to transform downtown Knoxville into a vibrant, walkable hub. These guidelines emphasize pedestrian engagement along street frontages, aiming to create an “outdoor room” atmosphere with active streets, sidewalks, parks, plazas, and building walls. Successful examples like Regas Square and Marble Alley demonstrate the potential for such development to drive commerce and community engagement. Reconnecting downtown to the riverfront remains a key objective in achieving this vision.

Knoxville’s street fronts are invaluable assets that define the city’s character, vibrancy, and economic vitality. They serve as an interface for commerce, culture, and community. Allowing parking garages along these frontages wastes their potential, replacing dynamic, pedestrian-friendly spaces with monotonous and uninviting facades. The current proposal for a parking garage on Front Street undermines Knoxville’s design vision, risking the creation of a pedestrian desert and derailing the aspiration to reconnect downtown with the Tennessee River. Protecting and enhancing our street fronts is essential for fostering a walkable urban environment that reflects Knoxville’s charm and promotes long-term growth. Following successful examples like Chattanooga, Knoxville should transform Neyland Drive into a boulevard that extends downtown to the river.

The project site is a cornerstone of our city, located adjacent to the historic Henley Street Bridge on the Tennessee River, with 32,000 vehicles passing daily. This prominent entrance to our city deserves a development that adheres strictly to our design guidelines, keeping Knoxville on a path to sustainable growth, architectural excellence, and enhanced community appeal.

The proposed project violates several key guidelines:

General Design Guidelines:

1. **Guideline (A)(3)(a) and (b)** – A parking garage should not be located on street frontage. Garages should be under the building or lined with retail, office, or residential space to engage pedestrians and drive commerce.

2. **Guideline (B)(2)(c)** – The parking garage obstructs sight lines to the historic Henley Street Bridge. Renderings for the project have evolved to show increased obstruction, but are still inaccurate.
3. **Guideline (B)(1)(a), (b), (c), (d), and (e)** – The building lacks human or pedestrian scale along Front Street. The Building presents a blank, monolithic parking garage instead of a dynamic streetscape because it is not divided into “modules” until 60 feet about the street level.
4. **Guideline (B)(2)(e)** – The proposal does not incorporate pedestrian-friendly plazas or amenities.

Boulevard District Guidelines:

1. **Guideline (A)(1)(a)** – The design lacks a lawn or landscaped area separating the building from the sidewalk.
2. **Guideline (A)(1)(c)** – The architecture and landscaping does not complement adjoining property or buildings.
3. **Guideline (A)(2)(a)** – No pedestrian entrance is clearly oriented to Front Street.
4. **Guideline (A)(2)(b)** – The design does not complement buildings on other streets.
5. **Guideline (A)(2)(c)** – The parking garage is obtrusive and not adequately screened from Henley Street and Front Street.

I am enclosing a packet with our presentation together with several additional images provided by our design review team. These additional images show that the proposed design will be out of character for Knoxville. The packet also includes a direct comparison of project renderings and an actual photograph of the Henley Street Bridge. The comparison shows that applicant renderings have been significantly modified to give a false impression regarding how this design will obscure the bridge. The packet shows how the new entertainment district proposed by the University of Tennessee will engage the streetscape of Neyland Drive and help make the University part of Downtown. The design vision of this connection is why this property is zoned in the Boulevard district – to help Neyland Drive transform from a downtown bypass into an engaging boulevard.

Furthermore, the project will significantly impact traffic safety at the intersection of Locust Street and Front Street. The current building design does not allow space for an intersection redesign to accommodate increased traffic and public safety. The project design should not be approved until we are certain that it can adequately address and accommodate these safety issues.

We urge the Planning Commission to hold this project to the established standards. By doing so, we can ensure Knoxville’s continued growth and revitalization, making our city a more vibrant and connected place for everyone. Let us strive for a development that truly reflects the vision set forth in the Downtown Design Guidelines. We can do better.

Thank you for your consideration.

Very truly yours,



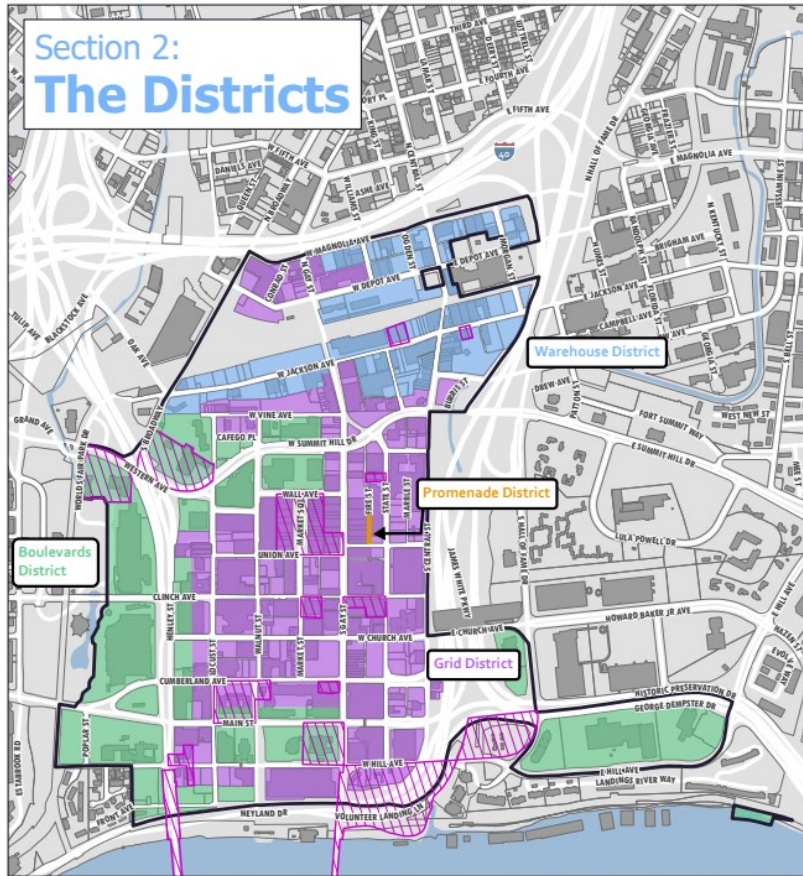
Daniel A. Sanders

ENCLOSURE

cc: Indya Kincannon, Knoxville Mayor
Knoxville City Council

PRESENTATION – OPPOSITION TO 8-A-24-OB

Section 2: The Districts



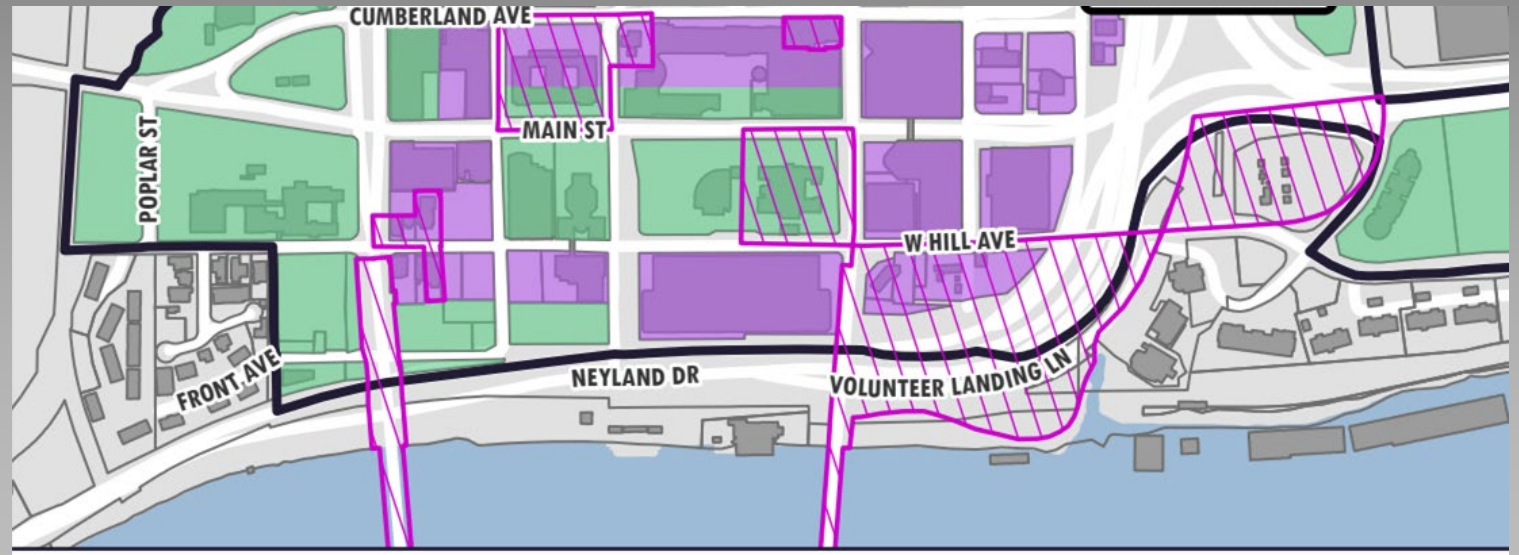
The district map shows the unique areas that have developed in downtown. Most of the district boundaries are at mid-block (that is, at the alleys), which helps to keep similar patterns of development on both sides of the street. Districts, while interrelated to each other, have a special identifying character as outlined in this chapter.

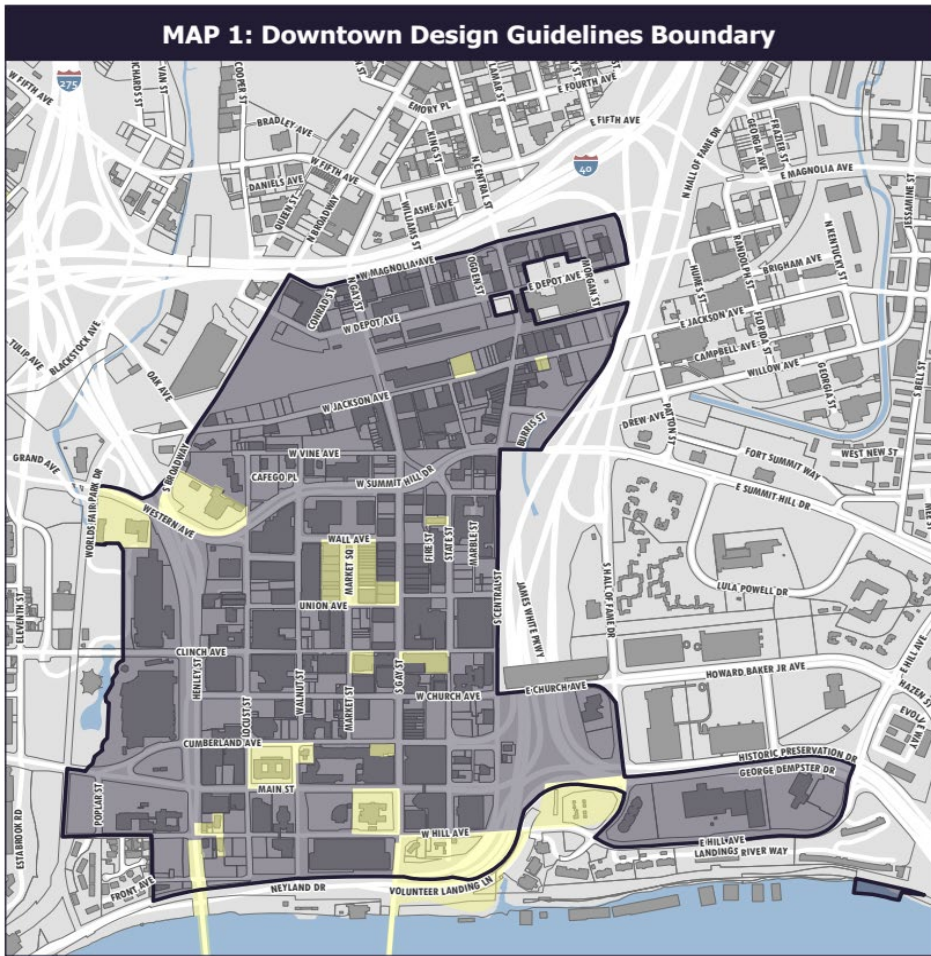
Districts

- Boulevards
- Grid
- Warehouse
- Promenade
- Historic (H) Overlay
Zoning District (local)



DK-G and DK-B base Zoning



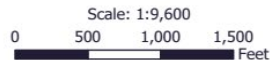


Map Information

- Downtown Design Guidelines Boundary
- Downtown Design Guidelines Area
- Historic (H) Overlay Zoning District (local)*

*Any local Historic overlay areas within these Design Review Board boundary are not subject to these Design Guidelines.

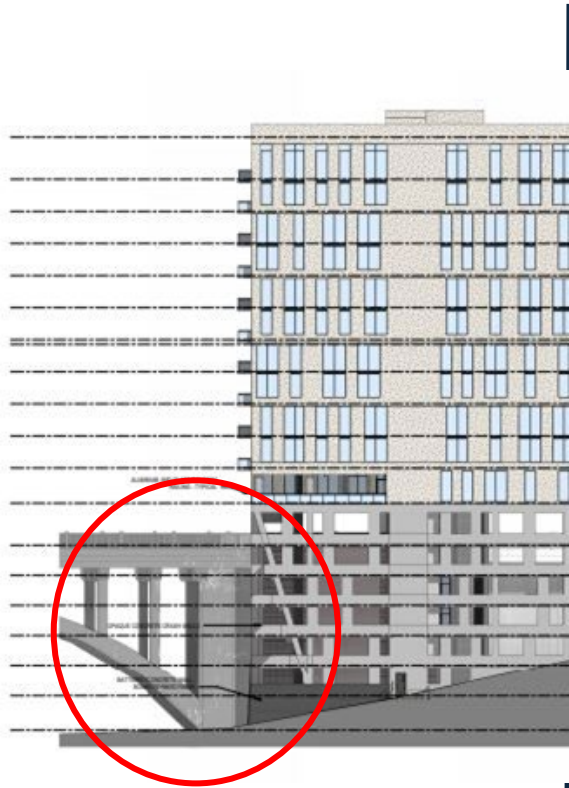
Official maps are available for inspection at <https://www.kgis.org/kgismaps/Map.htm>. The zoning layer is amended frequently through action of City Council. Therefore, recent zoning changes that have been approved by City Council may not be reflected here. Verify all zoning with Knoxville-Knox County Planning staff at (865) 215-2500.



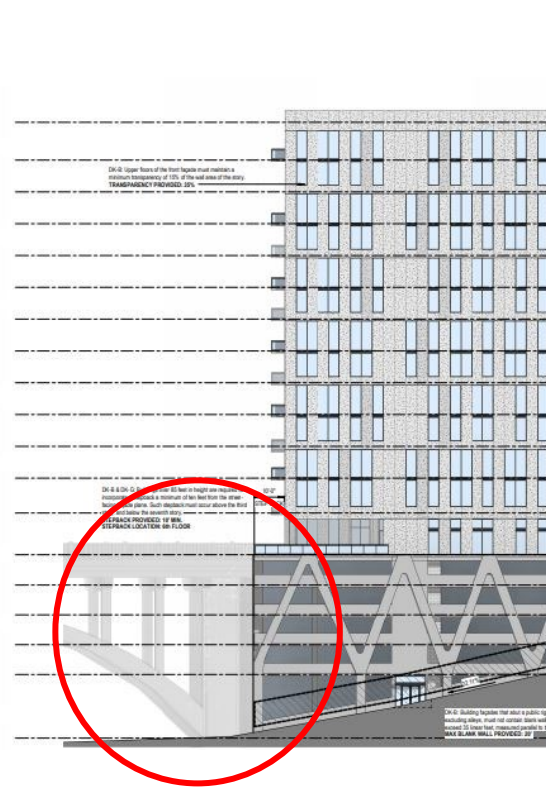
The Knoxville Downtown Design Guidelines supplement base zoning and increase the requirements for development within the Design Guidelines Boundary.

This property forms a part of Knoxville’s Riverfront and is situated on Henley Street at the main entrance to the Downtown Knoxville Design Area – 32,000+ trips per day (2023)

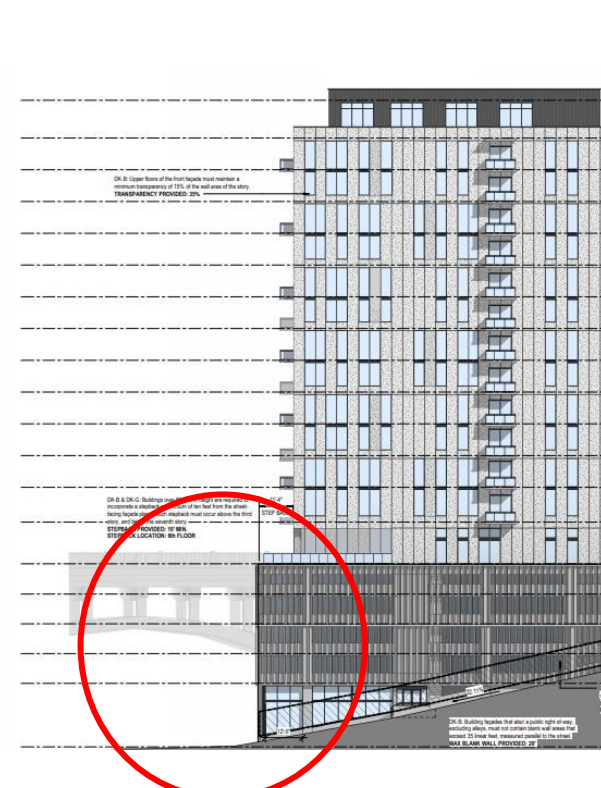
How is the Henley Street Bridge really impacted?



April 17th



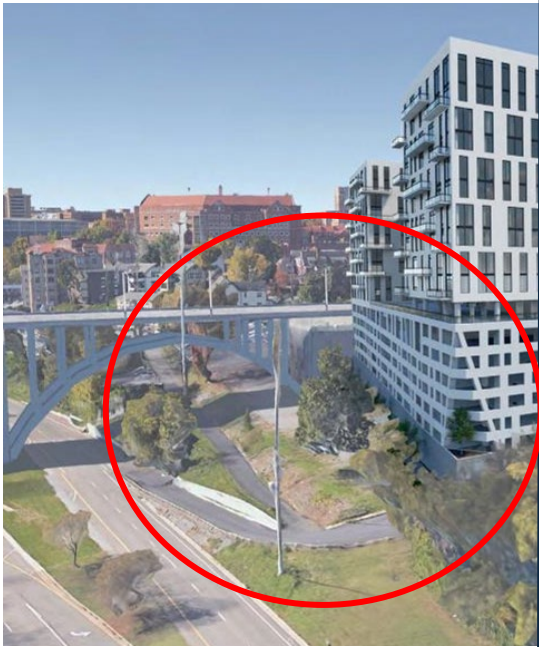
May 15th



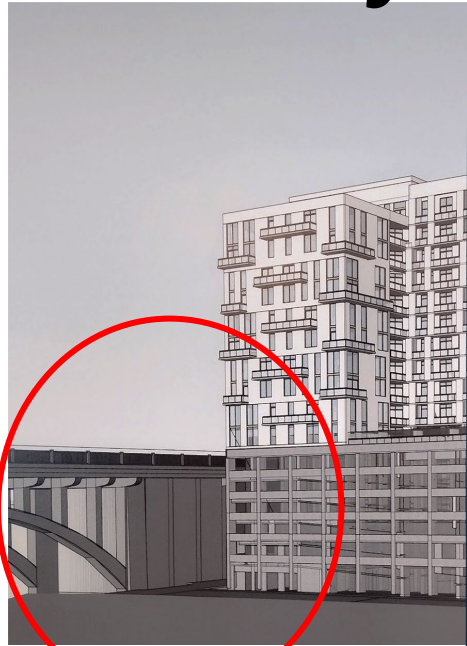
June 20th

Elevations and renderings were provided from applicant to the Design Review Board and Knox News Sentinel.

How is the Henley Street Bridge really impacted?



April 17th



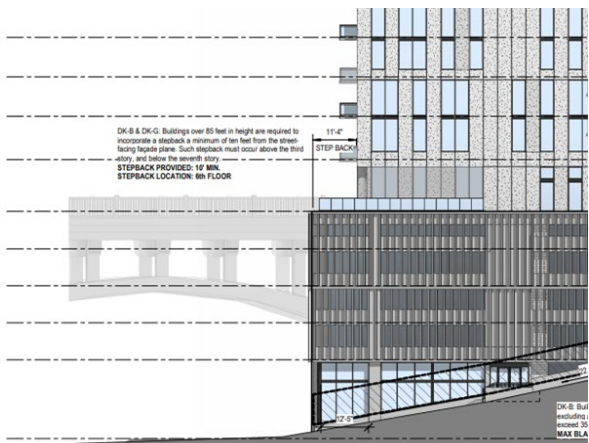
May 1st



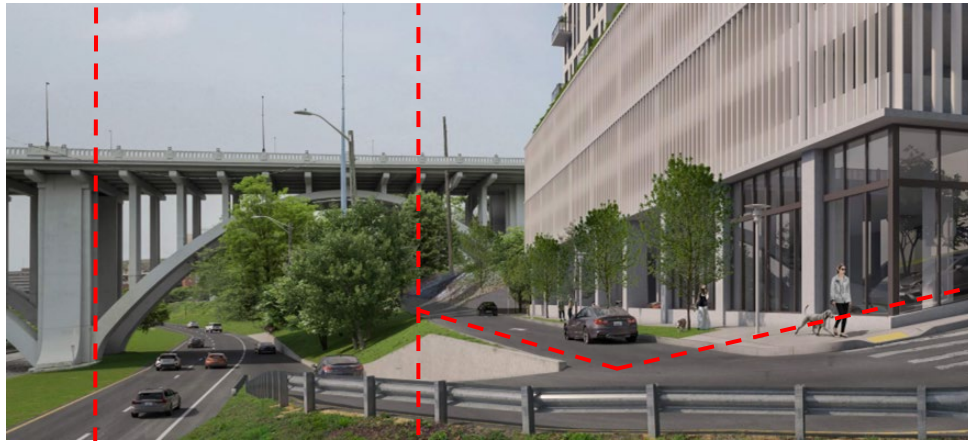
May 15th



June 20th



Are the renderings accurate?



RENDERING

This image has been significantly modified to appear to not block the bridge.



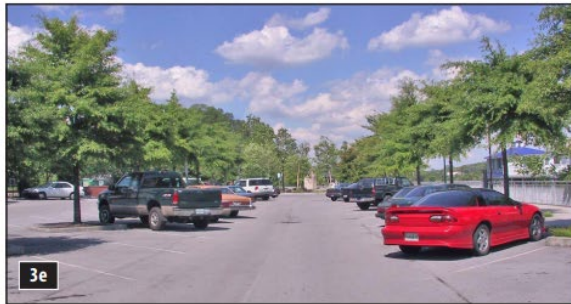
ACTUAL PHOTO

The Historic Henley Street Bridge will be obstructed by this building

A. PUBLIC REALM

3. PARKING FACILITIES

It is important to ensure that parking facilities (both public and private) are safe, accessible, and clearly marked. New parking facilities should be designed to be attractive, compatible additions to downtown. In general, new parking facilities should remain subordinate to the street scene.



GUIDELINES:

- 3a. Create parking garages that do not contain blank walls. Allow for future commercial uses that may not be feasible at the time of construction.
- 3b. Locate parking garages under structures, or provide for retail, residential or office uses that line the garage. Corner locations are preferable for commercial uses.
- 3c. Locate surface parking lots to the side or rear of buildings. No surface parking lots should be created in front of buildings.
- 3d. Screen surface lots, where they abut a public sidewalk, with decorative walls, fencing and landscaping.
- 3e. Distribute shade trees within surface lots at a ratio of 1 tree per 8 parking spaces. Trees may be planted in wells between spaces.
- 3f. Provide pedestrian-scale lighting (10-15 feet in height) that uniformly illuminates the lot.
- 3g. Access to parking garages should not limit options for future development of contiguous or adjoining space, especially on corners.

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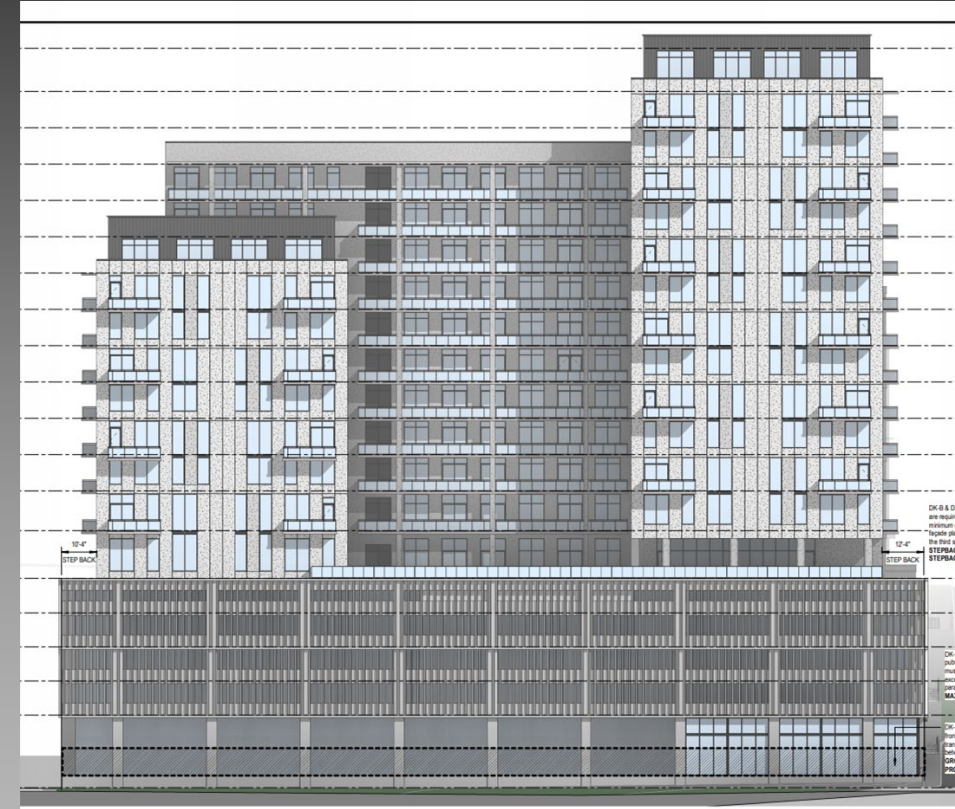
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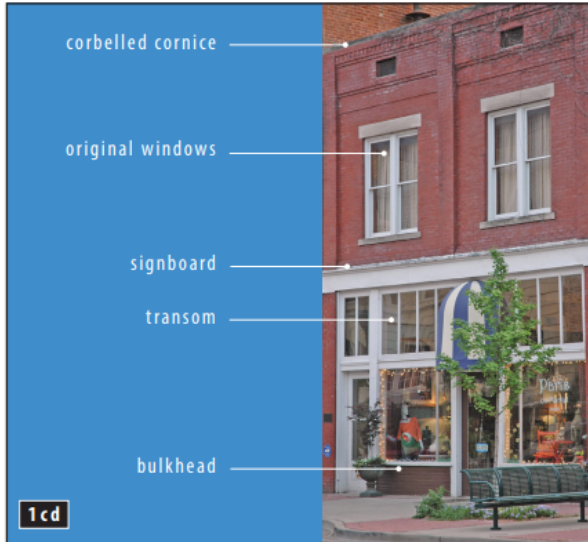
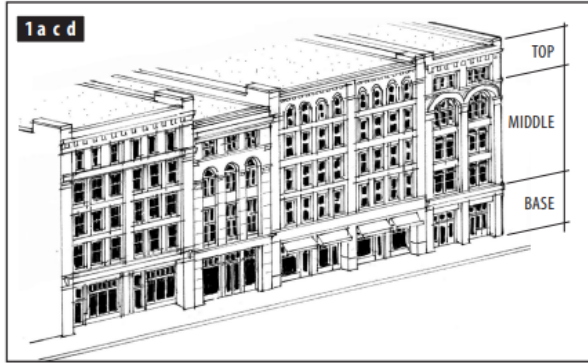
3g. Access to parking garages should not limit options for future development of contiguous or adjoining space, especially on corners.



B. PRIVATE REALM

1. BUILDING MASS, SCALE AND FORM

Building form should be consistent with the character of downtown as an urban setting and should reinforce the pedestrian activity at the street level. Creating pedestrian-scale buildings, especially at street level, can reduce the perceived mass of buildings. Historically, building technology limited height and subsequently created pedestrian-scaled buildings typically less than 10 stories. Building technology no longer limits the height of buildings, however, there is still a need for buildings that respond to pedestrians. The use of 'human-scale' design elements is necessary to accomplish this. Human-scale design elements are details and shapes that are sized to be proportional to the human body, such as, upper story setbacks, covered entries, and window size and placement.

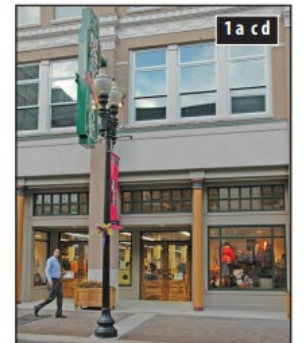
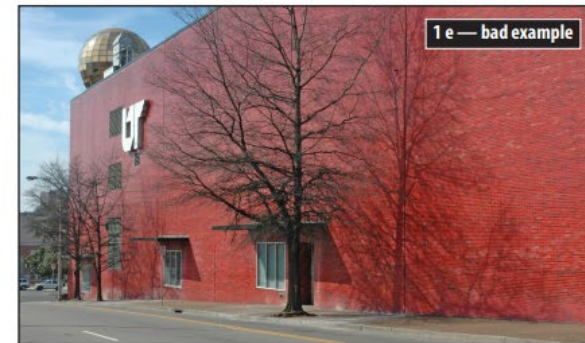


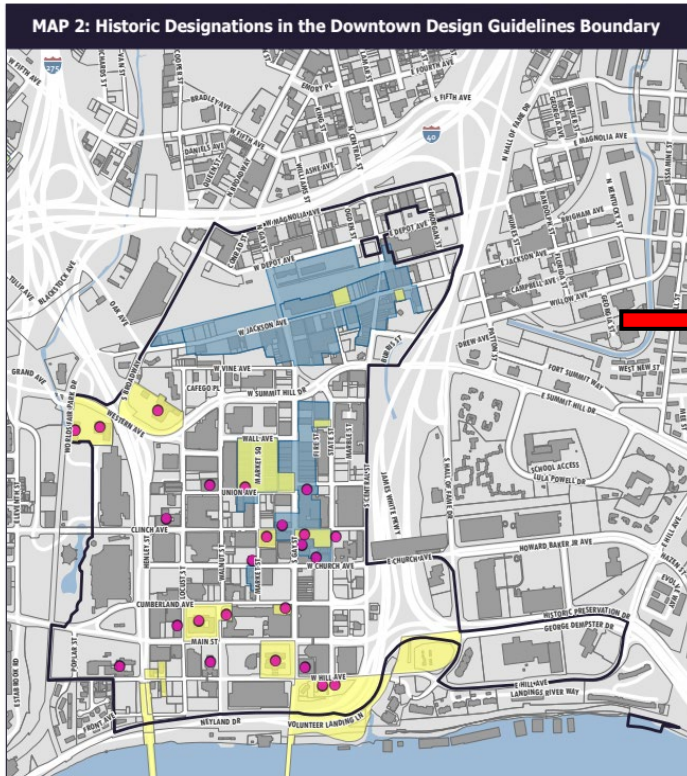
GUIDELINES:

- 1a. Maintain a pedestrian-scaled environment from block to block.
- 1b. Foster air circulation and sunlight penetration around new buildings. Buildings may be designed with open space, as allowed under existing DK zoning; or buildings may be 'stepped back' on upper floors with lower floors meeting the sidewalk edge.
- 1c. Use building materials, cornice lines, signs, and awnings of a human scale in order to reduce the mass of buildings as experienced at the street level.
- 1d. Divide larger buildings into 'modules' that are similar in scale to traditional downtown buildings. Buildings should be designed with a recognizable base, middle, and top on all exposed elevations.
- 1e. Avoid blank walls along street-facing elevations.

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Map Information

- Design Review Board Boundary
- Listed National Register Site
- National Register Historic District
- Historic (H) Overlay Zoning District (local)*

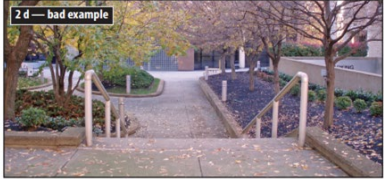
*Any local Historic overlay areas within the Design Review Board boundary are not subject to these Design Guidelines.

Scale: 1:9,600
0 500 1,000 1,500 Feet



**B. PRIVATE REALM
2. BUILDING LOCATION**

It is important to establish a strong relationship among buildings, sidewalks, and streets. This is typically accomplished through consistent setbacks that locate buildings on the same line.



GUIDELINES:

- 2a. Set buildings back five feet in order to provide wider sidewalk space when new construction in non-historic areas is to be more than half the length of the block.
- 2b. Consider using landscape elements to define the sidewalk edge where a building is to be set back from the sidewalk.
- 2c. Maintain sight lines to historic buildings that were originally located in an open setting, providing setbacks for new buildings next to historic structures in order to preserve views.
- 2d. Limit grade separations above or below the sidewalk, generally no more than 3 feet. Allow for clear sightlines into and out of buildings and plazas.
- 2e. Design private plazas to be pedestrian-friendly. Provide human-scale amenities and include landscaping.

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2e. Design private plazas to be pedestrian-friendly. Provide human-scale amenities and include landscaping.

B. PRIVATE REALM

3. BUILDING MATERIALS

New building materials should relate to the scale, durability, color, and texture of the predominate building materials in the area.



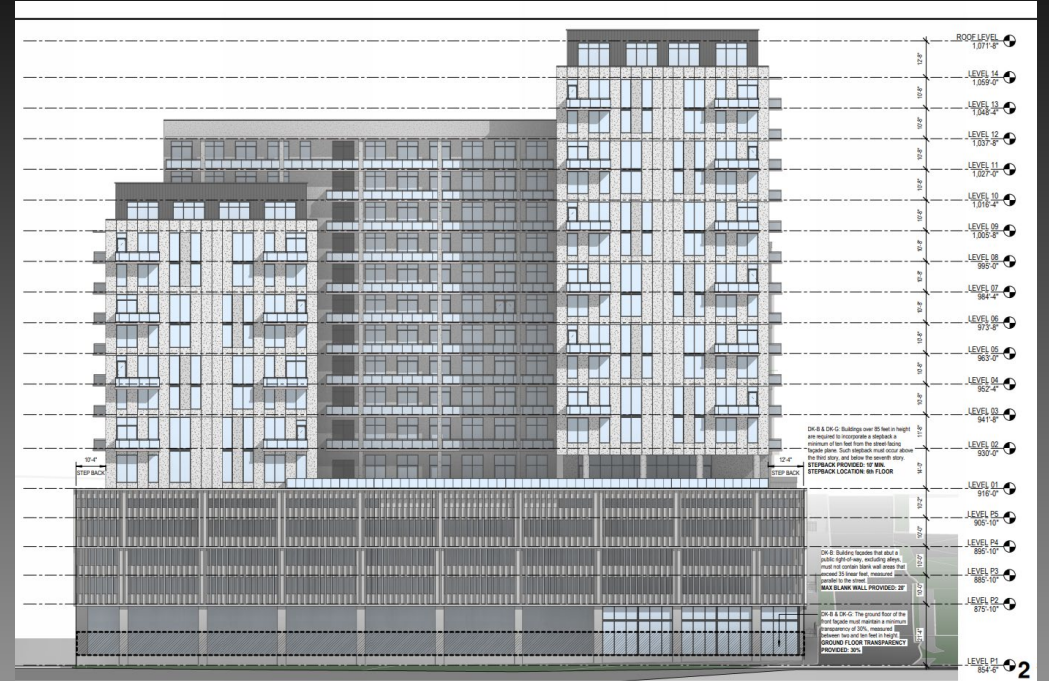
3 a — good example



3 a — bad example

GUIDELINES:

- 3a. Use complimentary materials and elements, especially next to historic buildings.
- 3b. Rehabilitate historic structures in accordance with the Secretary of Interior's Standards (see Appendix A).



A. THE BOULEVARD DISTRICT

1. YARDS/SETBACKS

Create yards that compliment the green space of adjacent buildings.



GUIDELINES:

- 1a. Separate new buildings from the sidewalk with lawn or other landscaped area.
- 1b. Plant native or naturalized trees and other landscape materials in the open spaces.
- 1c. Compliment the architecture and landscaping of adjoining property.
- 1d. Allow for plazas or similar quasi-public spaces in a portion of these private open spaces.

2. BUILDING CONSIDERATIONS

Enhance the architectural harmony of all buildings along the street.



GUIDELINES:

- 2a. Design building entrances to be clearly oriented to the street.
- 2b. Encourage building forms that are complimentary to the mass of adjacent buildings.
- 2c. Design building elevations to compliment the buildings along the side or back streets when buildings are to face more than one street.
- 2d. Screen service facilities or incorporate them into the design of new building so that they are not obtrusive.

3. RECOMMENDED SIGNS

Signs within downtown Knoxville are regulated by Article 12 of the Zoning



CONTEXTUAL IMAGES

RENDERING COMPARISION

UTK ENTERTAINMENT DISTRICT

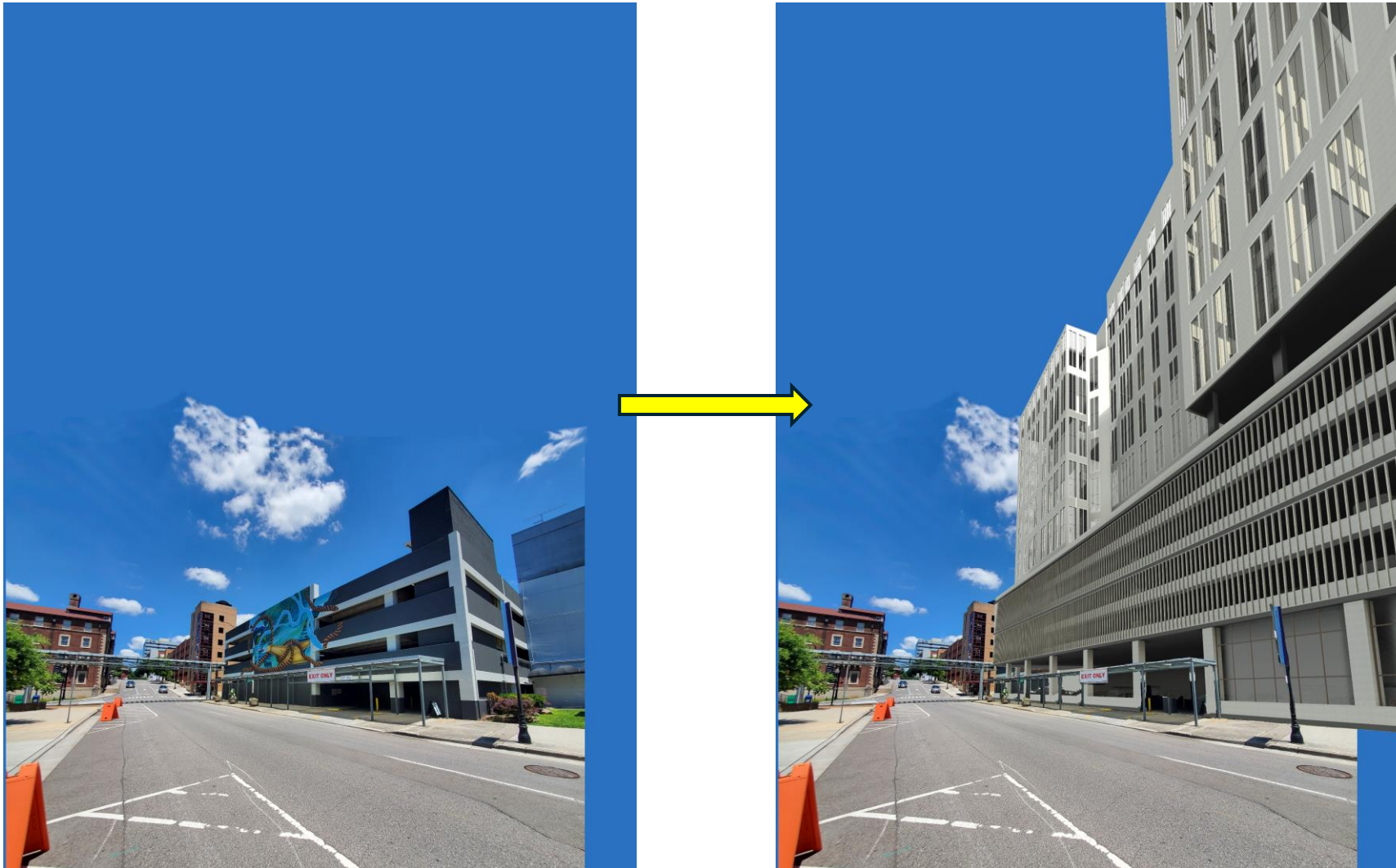


Almost 20 years ago the Hampton Inn was designed as a garage with a hotel on top. Knoxville stepped in and did the right thing to make sure our city's streetscape was protected. This set a precedent for quality development downtown and was the catalyst for the Design Review Board.

Shouldn't this project be held to the same standard?



The corner of Gay and Church is enriched by a courtyard, landscaping, and public art. Shouldn't this project be held to the same standard?



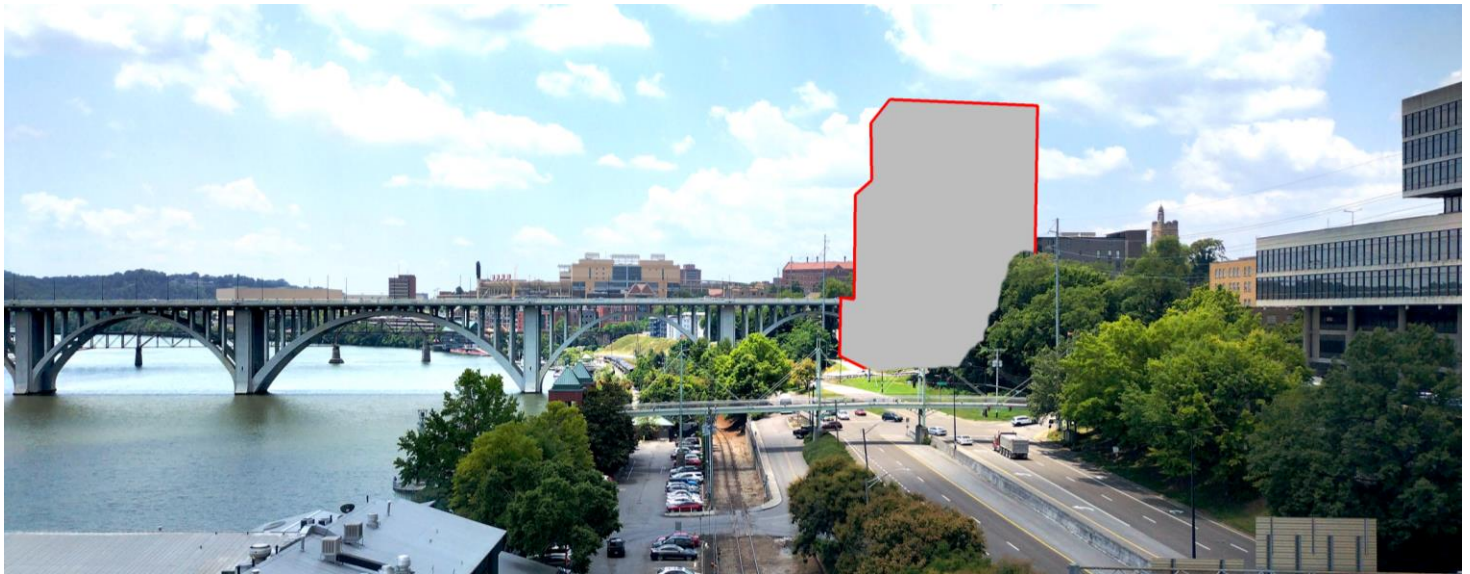
This is an old, existing garage that the owner has painted a mural on to reduce its negative impact on the pedestrian experience. That is a good attempt to repair poorly developed downtown property. But should this be used as precedent for current development? No.



Marble Alley was a catalytic project that transformed the north side of Downtown. Shouldn't this project be held to the same standard?



Location of building as shown in applicant provided rendering



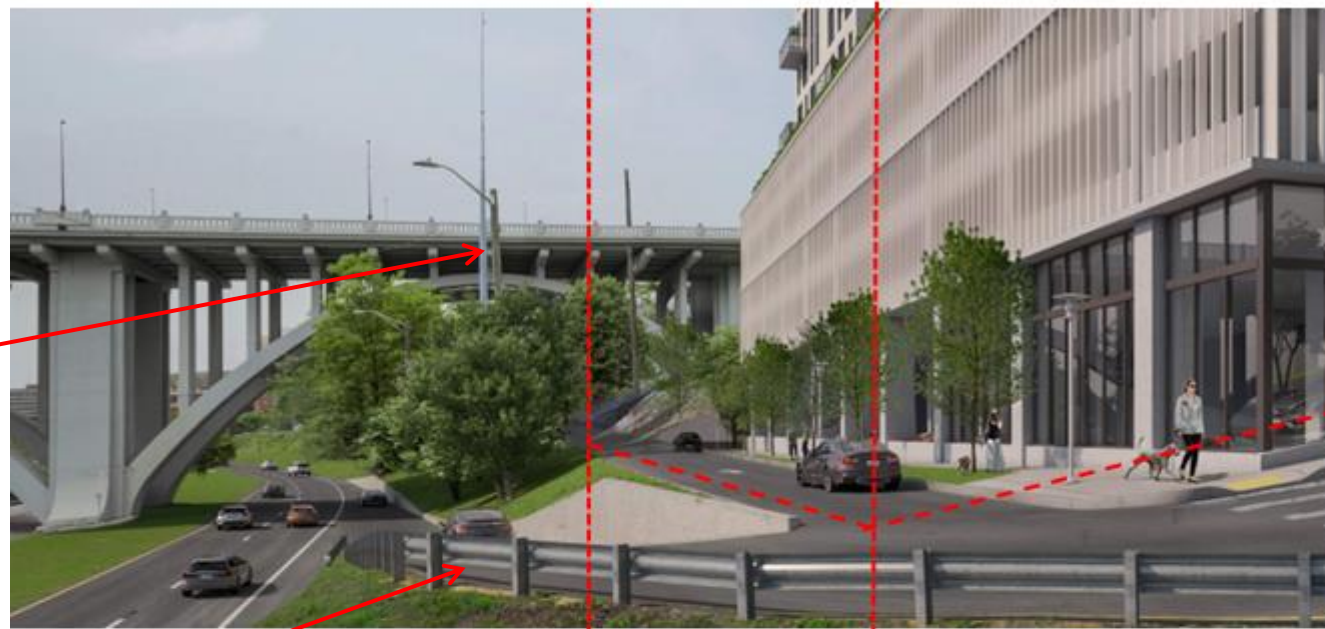
Location of building as shown in applicant provided drawings

The applicant provided a composite photo realistic rendering that misrepresents the location of the building to confuse the Design Review Board.

The above rendering and photo below are properly aligned. Note the relationship of the light pole, power pole, and bridge support in the center of the images.

Note the condition of the guardrail and the retaining wall. The above image is not a real photo – it is a false rendering showing false existing site conditions.

Neyland Drive, Front Avenue and all existing site elements in the applicant provided rendering have been manipulated relative to the bridge to intentionally give the false impression that the building will not block views of the Henley Street Bridge.



FALSE RENDERING

This image has been significantly modified to appear to not block the bridge.

ACTUAL PHOTO

The Historic Henley Street Bridge will be obstructed by this proposal.

Photo matched comparison is based on location in rendering image. Alignment and location of building placement is based on Henley Street Bridge in background.



UT 's new entertainment district will engage the streetscape of Neyland Drive and help it to transform into part of Downtown and the University. That is why this property is zoned in the Boulevard district – to help Neyland Drive transform from a downtown bypass into an engaging boulevard.