



Dear Knoxville-Knox County Planning Commission,

As you review the revised project for the Kerbela site, City Church, one of the development's immediate neighbors, respectfully submits the following comments.

Our property sits directly adjacent to the proposed development. In our previous comments, we expressed support for residential development in the South Waterfront and encouraged a design that reflects the vision established through the South Waterfront Form-Based Code and Vision Plan. We also raised concerns regarding pedestrian connectivity, traffic safety, and overall site integration with the surrounding neighborhood.

Unfortunately, the recently revised plans do not meaningfully address those concerns, nor do they appear to respond to several issues raised by the Planning Commission and community stakeholders during the previous review.

**The Proposal remains inconsistent with the South Waterfront Vision**

While the applicant has made minor revisions, the proposal remains largely inward-focused and falls short of the South Waterfront Vision Plan's goal of creating a walkable, connected, mixed-use neighborhood. The revised plan still does not provide meaningful north-south public pedestrian access through the site, despite demonstrating that such a connection is physically feasible. Instead, this area remains reserved as a private resident amenity. The proposal also fails to incorporate adaptable ground-floor space for future neighborhood-serving commercial or civic uses, particularly along Dawson Road where topographic constraints appear limited. Together, these design choices reduce connectivity, limit future neighborhood activation, and do not fully reflect the intent of the South Waterfront Form-Based Code.

**Dawson Road continues to present a blank street edge**

The Dawson Road frontage remains dominated by a long, inactive facade with little visual engagement at the pedestrian level. Blank walls create an uninviting pedestrian environment and diminish both walkability and perceived safety. This condition is especially significant given the site's proximity to City Church, Immanuel Community School, and surrounding residential areas. A more active frontage, with entrances, windows, gathering spaces, or adaptable commercial frontage, would better support the walkable urban character envisioned for the South Waterfront district.

**Traffic and safety concerns remain unresolved**

City Church previously requested an independent traffic impact study and road safety audit to evaluate potential effects on neighboring properties and community facilities, including Immanuel Community School. To our knowledge, no such study has been completed or committed to.

Important questions remain regarding:

- Vehicle conflicts between the proposed garage access and existing church circulation patterns;
- Potential cut-through traffic affecting children and families accessing the church and school;
- Parking demand and possible spillover impacts on neighboring properties; and
- Overall pedestrian safety along Dawson Road and adjacent streets.

The South Waterfront Vision Plan emphasizes reducing automobile dependence through compact development patterns, pedestrian-oriented design, and safe circulation systems. Without additional analysis, it remains unclear whether these objectives are being achieved.

**Conclusion**

City Church supports thoughtful residential development in the South Waterfront and recognizes the importance of adding housing in this area. However, we believe this proposal still falls short of the standards and aspirations established by the adopted South Waterfront Vision Plan and Form-Based Code.

We respectfully request that the Commission deny the application in its current form and require a revised proposal that:

1. Provides meaningful north-south public pedestrian access through the site;
2. Activates the Dawson Road frontage with a more engaging pedestrian environment;
3. Incorporates adaptable ground-floor space for future mixed-use opportunities;
4. Demonstrates stronger conformance with the South Waterfront Form-Based Code and Vision Plan; and
5. Completes an independent traffic impact study with appropriate mitigation measures.

The South Waterfront represents one of Knoxville's most important urban redevelopment districts. Development on this site should strengthen neighborhood connectivity, enhance the public realm, and contribute to the walkable urban environment envisioned by the community. We do not believe the current proposal achieves those objectives.

Respectfully,

Stephen Ellett  
Executive Director  
City Church of Knoxville