

FORM-BASED ZONING REPORT

►	FILE #: 4-A-26-OB	AGENDA ITEM #: 44
	POSTPONEMENT(S): 4/9/2026, 5/14/2026	AGENDA DATE: 8/13/2026
►	APPLICANT: RYAN ROBERTSON	
	OWNER(S): Doyle E Arp Kerbela Temple Holding Corp.	

TAX ID NUMBER:	109 A B 00103	<u>View map on KGIS</u>
JURISDICTION:	City Council District 1	
STREET ADDRESS:	315 KERBELA AVE	
► LOCATION:	South side of Sevier Ave, west side of Dawson St	
► APPX. SIZE OF TRACT:	5.7 acres	
SECTOR PLAN:	South City	
GROWTH POLICY PLAN:	N/A (Within City Limits)	
ACCESSIBILITY:	Access is via Kerbela Ave, a local road with 21-27 ft of pavement width within 35-40 ft of right-of-way, via Mimosa Ave, a local road with 20-26 ft of pavement width within 35-40 ft of right-of-way, via Dawson St, a local road with 21 ft of pavement width within 24-30 ft of right-of-way, and via Sevier Ave, a major collector with 30 ft of pavement width within 46-58 ft of right-of-way.	
UTILITIES:	Water Source: Knoxville Utilities Board Sewer Source: Knoxville Utilities Board	
FIRE DISTRICT:	Knoxville Fire Department	
WATERSHED:	Tennessee River	

►	ZONING: SW-6 (South Waterfront, Henley Gateway), SW-5 (South Waterfront, Bell Tower Walk)
►	EXISTING LAND USE: Public/Quasi Public Land
►	PROPOSED USE: Multifamily
HISTORY OF ZONING:	The property was rezoned from C-2 and R-3 to SW-6 and SW-5 as part of the adoption of the South Waterfront Form Code District (10-Y-06-RZ).
SURROUNDING LAND USE AND ZONING:	North: Agriculture/forestry/vacant land, office, multifamily - SW-5 (South Waterfront, Bell Tower Walk), SW-6 (South Waterfront, Henley Gateway) South: Single family residential, multifamily residential, agriculture/forestry/vacant land - SW-3 (South Waterfront, Sevier Avenue), SW-6 (South Waterfront, Henley Gateway), RN-4 (General Residential Neighborhood) East: Multifamily residential, public-quasi public (church) - SW-3 (South Waterfront, Sevier Avenue) West: Multifamily residential, public-quasi public (parking structure) - SW-6 (South Waterfront, Henley Gateway)

STAFF RECOMMENDATION:

- **Per Article 7.0.2.G., the Planning Commission should consider this request based on the approval criteria in subsection 8.a. and the attached Zoning Administrator report.**

COMMENTS:

This request is a Level III Alternative Compliance Review of the Form Base Code Districts (Article 7.0.2.G.), which requires approval by the Planning Commission. Below is a list of the most recent revisions, the list of alternative compliance requests, and the Planning Commission review criteria for reference.

PLAN REVISIONS

7/27/26 - 8/5/26 Sketch drawing of the public breezeway (tunnel), conceptual rendering view from the corner of Sevier Avenue and Dawson Street, and response documents (see Exhibits G, H, and I).

6/24/26 Revisions (these drawings are marked as being a draft for conversation only and have not been incorporated into the site plans at this time):

1. A "public tunnel" has been proposed to run beneath the amenities deck that spills out onto a public observation deck at the top of the westernmost existing staircase (shown on the pages titled, "Public Private Diagram").

5/27/2026 Revisions (case postponed at June meeting, therefore these revisions have not been reviewed by the Planning Commission):

1. Extension of the east-west pedestrian pathway approximately 75 ft from the western "ghost stair" to a newly proposed public plaza comprising 1,400 sqft within a public use area of 2,400 sqft. The measurements are based on the information presented in the revised site plan. [Rendered Site Plan (New Design), page 34 of the plan set (revised 5/27/2026)]

2. Installation of approximately 155 ft of sidewalk and other streetscape improvements along Mimosa Avenue that would not otherwise be required per Article 7.1.5, Streetscape Standards, of the South Waterfront Form Code (SW code). [Rendered Site Plan (New Design), page 34 of the plan set (revised 5/27/2026)]

NOTE: The required streetscape improvements along the subject property's frontages on Sevier Avenue, Dawson Street, Mimosa Avenue, and Kerbel Avenue remain unchanged from the original submittal.

3. Lighting the existing rock pile and providing an art installation to activate the Sevier Avenue and Dawson Street corner of the property. [Rendered Site Plan (New Design), page 34 of the plan set (revised 5/27/2026), and the corner activation narrative in Exhibit D, applicant's response document]

4. Lighting the ghost stairs. [Rendered Site Plan (New Design), page 34 of the plan set (revised 5/27/2026), and Exhibit D, applicant's response document]

NOTE: The nighttime renderings in the original submittal showed the ghost stairs illuminated, implying that lighting would be installed, but the plan did not explicitly state this.

5. Replacing the brick exterior on the eastern and westernmost massings that are oriented perpendicular to Sevier Avenue (and the river) with a stacked stone veneer to match the inner massings that are also perpendicularly oriented. [Perspective, pages 42, 43, and 44 with the revision date 5/27/2026]

NOTE: The material change is based on the three new nighttime perspective renderings; however, this change was not noted in any other submittal documents. The applicant's intent is unknown. The SW Code building envelope and materials standards are in Article 7.1.4.B.

The revised plan sheet, response document, and new perspective renderings and contextual images, submitted on 5/27/2026, incorporate the following modifications and clarifications. See the applicant's response document (Exhibit D) for justification of why certain comments were not addressed and confirmation of the requested zoning standard calculations.

NOTE: The plan set pages are not numbered sequentially, and some of the page numbers are out of order because the revised plan sheet page numbers do not match those of the original plan set. See the Rendered Site Plan (New Design), revised 5/27/2026, for the most current site plan (page 34 of the plan set).

ALTERNATIVE COMPLIANCE REVIEW REQUESTS

Alternative compliance review is intended to allow developments and nonprohibited uses that would not

otherwise be allowed under a strict interpretation of the Form District regulations but nevertheless comply with the intent of the applicable Form District and Plan.

The applicant is requesting relief from the following seven standards of the SW5 and SW6 South Waterfront Form-Based Code districts as a Level III: Alternative Compliance Review pursuant to Article 7.0.2.G.

1. Request to increase the maximum perimeter block size from 1,400 feet to the existing condition (approximately 3,000 feet), in the SW5 and SW6 Districts (Articles 7.1.3.F.3.a/b & 7.1.3.G.3.a/b).
2. Request to increase the maximum lot size from 3 acres to the existing condition (approximately 5.7 acres), in the SW5 and SW6 Districts (Articles 7.1.3.F.4 & 7.1.3.G.4).
3. Request to increase the maximum building footprint/floorplate from 30,000 sqft to 39,000 sqft in the SW5 District (Article 7.1.3.F.4).
4. Request to increase the front setback from 0' to 69'-0" from Sevier Avenue, in the SW5 and SW6 Districts (Articles 7.1.3.F.4 & 7.1.3.G.4).
5. Request to reduce the minimum building frontage at the setback from 75% to 0%, in the SW5 District (Article 7.1.3.F.4).
6. Request to increase the maximum side setback from 25' to 56'-0" from the Dawson Street interior side lot line and 32'-0" from the eastern interior lot line, in the SW5 and SW6 Districts (Articles 7.1.3.F.4 & 7.1.3.G.4).
7. Request to reduce the ground level transparent glass on the principal frontage from 70% to 63%, in the SW5 and SW6 Districts (Articles 7.1.3.F.6 & 7.1.3.G.6).

KNOXVILLE-KNOX COUNTY PLANNING COMMISSION ACTION FOR LEVEL III, ALTERNATIVE COMPLIANCE REVIEW (Article 7.0.2.G.7)

THE COMMISSION MAY TAKE ANY OF THE FOLLOWING ACTIONS:

- a. The Knoxville-Knox County Planning Commission must hold a public hearing subsequent to notification, consistent with its Administrative Rules and Procedures.
- b. The Knoxville-Knox County Planning Commission must approve or deny the application, or send the application back to the Administrative Review Committee for additional consideration.
- c. In the exercise of its approval, the Knoxville-Knox County Planning Commission may impose such conditions regarding the location, character or other features of the proposed buildings as it may deem advisable in the furtherance of the general purposes of the applicable Form District Plan.

APPROVAL CRITERIA (ARTICLE 7.0.2.G.8)

- a. In reviewing an application for Alternative Compliance Review in cases other than applications concerning reconstruction or expansion of nonconforming structures in which nonconforming uses operate, the Knoxville-Knox County Planning Commission must consider the following:
 - i. Consistency with the applicable adopted Plan;
 - ii. That the development will not have a substantial or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare;
 - iii. That the development will be constructed and operated to be compatible with the district;
 - iv. That the proposed development can be adequately served by public facilities;
 - v. That the proposed development will not result in the destruction, loss, or damage of any significant natural, scenic, or historical district, site, or feature;
 - vi. Compliance with the intent of the applicable Form District and Plan;
 - vii. Compliance with all applicable Zoning Ordinance requirements;
 - viii. Compliance with all applicable Subdivision regulations;
 - ix. Compliance with the Major Road Plan;
 - x. Compliance with the One Year Plan; and
 - xi. Compliance with the Stormwater and Street Ordinance.

Knoxville-Knox County Planning Commission's approval or denial of this request is final, unless the action is appealed to the Knoxville City Council. The date of the Knoxville City Council hearing will depend on when the appeal application is filed. Appellants have 15 days to appeal a Planning Commission decision in the City.



Zoning Administrator Report for Level III: Alternative Compliance Review

315 Kerbela Avenue

Peter Ahrens, Director
City of Knoxville, Plans Review and Building Inspections

Overall, the revised submittal reflects changes made in response to the Planning Commission's remand and subsequent discussions with four members of the South Waterfront Advisory and Advocacy Group (SWAGG). Revisions focused on site layout, pedestrian access, including the provision of a north-south public connection, streetscape enhancements, and the flexibility afforded through the Alternative Compliance provisions. The applicant has also continued to coordinate with City administration and leadership regarding the dedication of land along Sevier Avenue to the City. As the project advances through the development process, CR Endeavors intends to work with the City with the Public-Private Partnership team to ensure that this portion of the development aligns with the City's goals and objectives.

The Zoning Administrator's recommendation remains that the Planning Commission consider the proposed Level III Alternative Compliance Review in light of the site's unique conditions, the applicant's ongoing coordination with the Administrative Review Committee, and the revisions made to address both regulatory requirements and community concerns related to building massing, public accessibility, and site connectivity.

Respectfully,

A handwritten signature in black ink, appearing to read 'P. Ahrens', is positioned below the word 'Respectfully,'.

Peter M. Ahrens
Director of Plans Review and Inspections

TO: City of Knoxville Administrative Review Committee
FROM: Knoxville-Knox County Planning
DATE: July 17, 2026
PLANNING FILE #: 4-A-26-OB
SUBJECT: 315 Kerbela Ave. – Level III Alternative Compliance Review

At its July 9, 2026, meeting, the Knoxville-Knox County Planning Commission referred the Level III Alternative Compliance Review back to the Administrative Review Committee for further consideration.

At the Commission's request, any request for alternative compliance shall include an item-by-item list of the requested deviations, an explanation of the purpose of each standard, and a justification for how the proposal meets the criteria for approval for each standard.

The developer was encouraged to review the Commission's comments, proposed conditions of approval, and the comments surrounding the form and massing. In addition to the summary below, the video recording of the Planning Commission meeting is at the following link:
<https://vimeo.com/1209606231?share=copy&fl=cl&fe=ci#t=1386.001>

SUMMARY OF DISCUSSION AND COMMENTS

1. Building form and pedestrian engagement
 - a. This proposal does not embody the intent of the vision plan: a lively, mixed-use, pedestrian-friendly, human-scale project.
 - b. The facades are flat and unarticulated. The code encourages balconies, porches, bay windows, and other projections because they provide the architecture with definition, which is currently missing.
 - c. There is a lack of interest in the facades - they are flat with overly simple material articulation
 - d. In agreement with community concerns with scale.
 - e. The long, horizontal orientation of the proposed building is an impediment to accessing the waterfront.
 - f. The project separates itself from the public with the plaza levels and tunnel that cuts through the site. This is an unfriendly way to make this connection.
 - g. The intent of the dimensional standards is to ensure walkable neighborhoods, that public ROW remains open, connectivity is fostered, and is never dependent on private control. A tunnel is pushing the limit on what can be considered.
 - h. There was a desire for greater emphasis on the mixing of public-private spaces.
 - i. The intent of the code is for lively public and private engagement.
 - j. There could be more engagement with the street. This has not been fully explored.
2. Retail/commercial

- a. Topography and the location being on the outer edge of two commercial areas make commercial uses challenging on this site. Examples of similar situations in the downtown area were provided.
 - b. The end product should not be a consideration but rather adherence to the code. A building's use can change over time.
 - c. Currently, this location may not support dense retail; however, it is incumbent upon the [Planning Commission] to enable this future evolution and the potential of the site.
 - d. It would be beneficial to provide some ground-floor space that could be converted to commercial uses in the future.
- 3. Clarity of the request
 - a. Concern with the structure of the alternative compliance request and process.
 - b. Needed: an item-by-item explanation or justification of why alternative compliance is appropriate, and what that alternative compliance is.
- 4. Site constraints and general challenges
 - a. Topography
- 5. Public engagement
 - a. Would like to see more communication with the SWAAG group before the next meeting.

SUMMARY OF PROPOSED CONDITIONS

1. Prior to the issuance of permits, the applicant shall coordinate with the Register of Deeds to establish and record a public access easement covering the entire north-south connection.
2. The public access area shall remain open daily during certain hours, with “Dawn-Dusk” and “6 am – 11 pm” as considerations. No gate, lock, or other access-control measures shall restrict public access during these hours, except for temporary closures required for maintenance or public safety.
3. Permanent wayfinding signage shall be installed, identifying the area as open to the public and directing visitors to the entrance and observation deck.
4. The tunnel interior, ghost stairs, plaza, and other publicly accessible areas shall be illuminated in accordance with applicable City standards.
5. The recommendations of the Traffic Impact Study shall be incorporated into the development plan and completed prior to the issuance of any applicable building permits.





Zoning Administrator Report for Level III: Alternative Compliance Review

315 Kerbela Avenue

Peter Ahrens, Director
City of Knoxville, Plans Review and Building Inspections

I. Summary

At the May 14, 2026, Planning Commission meeting, the application for a Level III: Alternative Compliance Review pursuant to Article 7.0.2.G was considered and subsequently remanded to the Administrative Review Committee (ARC) for further review of issues related to site layout, connectivity, and consistency with the applicable South Waterfront Form-Based Code districts (SW-5 and SW-6).

Following the remand, the applicant submitted revised plans and a written response addressing comments from both the Planning Commission and prior ARC review in accordance with the alternative compliance process outlined in Article 7.0.2.G.1, which allows consideration of proposals that may not strictly meet dimensional standards but are intended to meet the overall district vision.

A revised submittal was proposed to staff and reviewed by the ARC. At the June 11, 2026 Planning Commission meeting, the applicant requested to postpone their project to the July meeting in order to further evaluate certain aspects of the project. This request was approved by the Planning Commission and the applicant subsequently submitted the most recent drawings which most notably propose a north-south connection through the site. This pathway will be below the private development's main lobby and will include an elevator and stairway connection from Kerbela/Mimosa Avenue to the proposed public observation deck. A site plan, referred to as the "Public Private Diagram," and a conceptual diagram showing the proposed tunnel have been provided to illustrate this proposed connection.

The revised submittal includes modifications to pedestrian circulation intended to address prior concerns related to block configuration and connectivity under Articles 7.1.3.F.3 and 7.1.3.G.3. Specifically, the applicant proposes a revised east-west pedestrian pathway along Sevier Avenue that incorporates the existing historic "ghost" stairs, with the intent of providing public access and improving connectivity across the site while maintaining visual access toward the Tennessee River, consistent with the "window-to-the-water" concept identified in the SW-5 district intent statement. The plans continue to preserve the "ghost" stairs as part of the site's internal pedestrian network, reflecting prior discussions regarding the integration of existing site features into the development plan. The proposed connection will be evaluated by the Building Department during plans review to determine compliance with applicable building code requirements.

In addition, the applicant has indicated streetscape and sidewalk improvements along Kerbela/Mimosa Avenue and Dawson Street, consistent with the frontage and streetscape provisions of Article 7.1.5 and the general development standards in Article 7.1.4.D, including pedestrian accommodations and landscape integration. The updated site plan does not depict public improvements within the Sevier Avenue right-of-way or streetscape, as these elements will be reviewed and approved in coordination with the Public Private Partnership team to ensure consistency with future right-of-way improvements.

The resubmittal further proposes a connection to the Gulf and Ohio (G&O) Trail, which is intended to support multimodal access consistent with the connectivity goals of the South Waterfront Vision Plan and the pedestrian network expectations embedded within the Form-Based Code framework.

Overall, the revised submittal reflects changes made in response to the Planning Commission remand and ARC comments, with a focus on site layout, building placement, pedestrian access, and streetscape improvements, as well as the flexibility allowed under the alternative compliance provisions.

II. Administrative Review Committee

The application was reviewed by the Administrative Review Committee (ARC) in multiple rounds beginning March 18, 2026, with revisions submitted following each review. The Planning Commission considered the application on May 14, 2026, and remanded it to the ARC for further review. The applicant submitted revised drawings and responses on May 26, 2026, initiating an additional ARC review. Following the June 11, 2026 postponement, two additional drawings were submitted to the ARC reviewers which propose a public pathway through the site, providing a north-south connection.

Based on the most recent submittal, the following comments remain or were identified by the ARC on June 26, 2026:

- Article 7.1.3.F.3.a/b & 7.1.3.G.3.a/b - Guide lot layout and outline the maximum block perimeter and building setbacks permitted in this district to ensure walkable neighborhoods. Block size -Maximum perimeter of 1,400 feet. This development appears to exceed the maximum block size perimeter of 1,400 feet. The development will need to be subdivided or this development will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 & 7.1.3.G.4 – Lot Size Max – 3 acres. This development exceeds the lot size maximum for both the SW-5 and SW-6 district of 3 acres and will need to be subdivided or this development will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 – Footprint/Floorplate (max) – 30,000sf; does not apply to structured parking. This development exceeds the footprint/floorplate max of 30,000sf on the SW-5 zoned portion of the property with a provided measurement of 39,000sf (overall total 58,000sf). This standard will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 & 7.1.3.G.4–Principal Building Siting – Front Setback – 0’. The site plan provided shows a front setback of 69’-0” from Sevier Avenue. This does not meet the front setback standard and will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 –Principal Building Siting – Frontage at Setback (min) – 75% to River Rd. and Sevier Ave. The site plan provided shows the building sited beyond the front setback and therefore the development does not meet the frontage at setback minimum of 75%. This will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 & 7.1.3.G.4 –Principal Building Siting – Side Setback (max) – 25’. The site plan provided shows the building sited at 56’-0” from the Dawson St. interior side lot line and the building sited 32’-0” from the eastern interior lot line both of which are over the maximum side setback of 25’. This will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.6 & 7.1.3.G.6– Building Entries – Ground Level - Min 70% transparent glass at the ground level on the principal frontage. The provided elevations show a ground floor glazing calculation of 63%. This will need approval as a Level III: Alternative Compliance Review.

- Article 7.1.3.F.9.c & 7.1.3.G.9.c – Sustainability – Reflectivity, Heat Island Reduction, Roof and Surface Lots. Surface lots shall provide shade and/or use light-colored/high albedo materials with a solar reflectance of at least 0.3 (30%). Applicant has indicated that a mix of pervious and impervious materials will be used for the surface parking lot; however, specific details regarding the materials used and their capability of meeting this standard have not been provided. Please provide additional details regarding the materials being used to show that compliance will be met.
- Article 7.1.3.F.9.c & 7.1.3.G.9.c – Sustainability – Roofs shall use an Energy Star Compliant (highly reflective) for a minimum of 75% of the roof surface. Please provide specific details regarding the materials used for roofing and how they will meet this standard.
- Article 7.1.4.D.2. – Structured parking - New parking facilities must be designed in such a way that does not adversely affect their surroundings. The driveway from Dawson points vehicles directly to the side of the adjacent single-family house. How will headlights be mitigated?
- Provide all elevations of the proposed project to review compliance with Article 7.1.4.B Building Envelope and Materials.
- Minimum ROW sidewalk width is 5 feet. Additional sidewalk width, landscape strip width, or other ROW impacts will be subject to detailed design review and may require modifications to the widths and layouts shown as part of the ARC submittal. Deferral of that detailed ROW review is acceptable at this time to allow ARC and Planning Committee review to proceed, with the understanding that those approvals would not be impacted by revised ROW improvements, provided onsite structure locations and required setbacks remain unchanged.
- When scaled, at least two locations still appear to exceed 2H:1V slopes. Detailed design review may require additional retaining walls so as not to impact the site layout.
- In accordance with Sections D106.2 and D106.3 of Appendix D in the 2024 International Fire Code, two separate and approved fire apparatus access roads are required for this project. If the two access points/parking lots do not connect, then approved turnarounds must be provided.
- Please provide dimensions verifying the remoteness required by IFC D106.3.
- A landscape plan is required for ARC review in order to determine if the landscape-specific requirements of the form-based code will be met.
 - If exact species to be planted are not known at this time, trees and shrubs can be represented by symbols that show proposed quantities, locations, and spacing and additional details can be added at a later date. At minimum, trees should be denoted as shade trees (mature height 50ft or greater) or ornamental (mature height <50ft) or evergreen. The plan should show any trees to be preserved, as well. Include a schedule including the quantities of all proposed trees and shrubs.
 - See additional comments for a list of code requirements.

- The Tree Protection Ordinance will apply for the total property size. The exact size was not provided and the lot is not platted, but an estimate based on KGIS of ~5.75 acres is used for the calculations below.
 - o Sec. 14-34(b) requires preservation of 6 trees per acre which would be ~35 trees for the total estimated property size. There are few trees that could count toward preservation along the hillside, but not 35 total. Any that are preserved will count proportionally toward the planting requirement in Section 14-36 (8 trees per acre) which would be a total of ~46 trees, half of which must reach a mature height of 50ft or greater.
 - o Article 7.1.3.F.2.c.ii. also requires preservation of either 1 healthy large tree per lot or 6 per acre, whichever is greater (6/ac is greater in this case and will be applied in accord with the Tree Protection Ordinance since the requirement is the same).
 - o We will want to see diversity in the tree species selected. Use the requirements in Article 12.4.B as a guide.
 - o Planting space and terrain was expressed as a concern. Because the site is large and varied and will be excavated for building construction, space for trees should be included in the excavation. Tree pits can be dug out similar to downtown street trees or soil can be added on top of the rock. Tree species that can grow with limited root space include eastern redcedar, catalpa, overcup oak, ginkgo, Frontier elm, Kentucky coffeetree, trident maple, and others.
- The general development standards in Article 7.1.4.D.1. require:
 - o b. A visual buffer of landscaping between surface parking and adjacent properties
 - This will apply to the west parking area where 8 parking spaces abut the adjacent lot.
 - o c. Any parking lot adjoining a public street shall be screened from view to a height of 3 feet by walls, berms or landscaping or a combination of these 3. If landscaping only is used, the planting bed shall be a minimum of 10 feet wide.
 - This will apply to the west parking area that most closely abuts Kerbela Ave.
 - o d. Separate parking areas from buildings by use of a raised walkway or planting strip. Avoid directly abutting parking aisles or spaces to the edge of a building.
 - This will apply where parking abuts the building.
- The vision plan lists streets as ST-42-24-PL to the east and west. This also applies to the corner side Dawson St. Article 7.1.5.D. requires street trees at 30' OC, 5' wide continuous planting strip for this street type. We will defer to Engineering and Zoning for whether the planting strip will be required along the sidewalks.

- o Note that street trees in the ROW (outside of private property) do not normally count toward the density requirements listed above. If the planting strip is not required by Engineering, the trees that would have been planted in the ROW can potentially be incorporated along the property lines but on private property to serve some of the same intent (provide shade for the walking paths, creating the tree-lined street aesthetic, reduced noise, etc.).

III. Administrator Action

It is the Administrator's recommendation that the Planning Commission consider the proposed Level III Alternative Compliance Review in light of these unique site conditions, the applicant's ongoing coordination with the Administrative Review Committee, and the revisions made to address both regulatory requirements and community input related to massing and public connectivity.

Respectfully,



Peter M. Ahrens
Director of Plans Review and Inspections

TO: City of Knoxville Administrative Review Committee
FROM: Knoxville-Knox County Planning Commission
DATE: May 20, 2026
PLANNING FILE #: 4-A-26-OB
SUBJECT: 315 Kerbela Ave. – Level III Alternative Compliance Review

At its May 14, 2026, meeting, the Knoxville-Knox County Planning Commission referred the Level III Alternative Compliance Review back to the Administrative Review Committee for further consideration. The Planning Commission reviewed each item identified as requiring a Level III Alternative Compliance Review approval. Below is a summary of the comments provided for each.

The Commission's discussion and comments focused primarily on block size, building scale, and public access through the site. While the Commission had little discussion and stated there is no concern with some of the requested modifications, these may be more of a point of discussion if the primary concern of allowing north/south public access through the site is not addressed.

SUMMARY OF COMMENTS

- **Article 7.1.3.F.3.a/b & 7.1.3.G.3.a/b – SW5 and SW6 Districts, Block Size Max (perimeter) – 1,400 feet**

The Planning Commission did not believe it was necessary to subdivide the lot to accommodate the maximum block size perimeter of 1,400 feet if the site design were adjusted. Several commissioners interested in enhanced connectivity said they could be more flexible on the building size and massing if the site plan provided more connectivity, noting the current plan's lack of engagement with the surrounding community. The single building was identified in the discussion as a barrier to increased walkability in the area, particularly relating to bicycle and pedestrian connections between the Gay Street Bridge and the neighborhoods and apartment complexes along Mimosa and Kerbela Avenues. It was noted that the block size and the building's layout, being placed horizontally to the river, resulted in a building of a massive scale. Several Commissioners recommended separating the structure into two or more buildings to provide north/south access, perpendicular to the river. Public spaces like an arcade or a plaza were mentioned as potential site amenities that could facilitate connectivity and connection within the site.

- **Article 7.1.3.F.4 & 7.1.3.G.4 – SW5 and SW6 Districts, Lot Size Max – 3 acres**

The lot size was less of a concern than providing opportunities for north/south connectivity through the site.

- **Article 7.1.3.F.4 – SW5 District, Building Siting and Configuration, related to Building Footprint/Floorplate (max) – 30,000 sf**

Several Commissioners noted concerns that the building's footprint/floorplate exceeds the 30,000 sf maximum allowed. It was again suggested that the development be separated into two or more smaller buildings and perhaps make the buildings taller to make up for lost floor space.

- **Article 7.1.3.G.4 – SW6 District, Building Siting and Configuration, related to Building Footprint/Floorplate (max) – 50,000 sf**

The Planning Commission lacked sufficient information to evaluate the request and recommended that the applicant submit additional information to the Administrative Review Committee.

- **Article 7.1.3.F.4 & 7.1.3.G.4 – SW5 and SW6 Districts, Principal Building Siting and Configuration, related to Front Setback – 0'**

The Planning Commission recognized the site constraints and the challenges this presented to complying with the strict requirements of these two articles.

- **Article 7.1.3.F.4 – SW5 District, Principal Building Siting and Configuration, related to Building Frontage at Setback (min) – 75% to Sevier Ave**

The Planning Commission recognized the site constraints and the challenges they presented to strict compliance with this article.

- **Article 7.1.3.F.4 & 7.1.3.G.4 – SW5 and SW6 Districts, Principal Building Siting and Configuration related to Side Setback (max) – 25'**

The Planning Commission recognized the site constraints and the challenges this presented to complying with the strict requirements of these two articles.

- **Article 7.1.3.F.6 & 7.1.3.G.6 – SW5 and SW6 Districts, Building Entries (Building Envelope Articulation) – Min 70% transparent glass at the ground level on the principal frontage**

Several Commissioners expressed the need to activate the corner of Sevier Avenue and Dawson Street. One suggested solution was to build out the ground floor to allow conversion to commercial use later.

Note that during the meeting, it was stated that the transparency requirement was met at 62%, but the minimum is 70%.



Revised Notes and Code Compliance Summary

Article 7.1.3.F.4 & 7.1.3.G.4

Comment

Providing a north/south connection through the site is not considered a practical or architectural solution. The slope exceeds 20% on both the east and west boundaries of the site and increases to greater than 40% down toward the center.

An east-west connection is proposed, connecting with the existing “ghost” stairs and incorporating a gathering plaza for public use (see Exhibit).

Article 7.1.3.F.4- SW-5 Building site (footprint) Max 30,000 sf

Site Area and Building Footprint

- 30,000 SF
- The proposed five-level structure has an approximate 39,000 SF footprint.
- The site totals approximately 5.7 acres, with only 3.2 acres considered buildable area.
- The 39,000 SF footprint represents approximately 15% of the total acreage and roughly 27% of the 3.2 buildable acres. The form-based code allows for 23% per 3 acres - within SW-5 for max footprint- this deviate proportionally with the additional .2 acres to 27% footprint, a hardship of **4%**. The vision was 30,000 per 3 acres, at 3.2 usable are allows for 8,612 sf and the project is at **9,000 sf**. above the max allowed.
- Although the proposal exceeds 30,000 SF, the overall area is consistent with the intent of the form-based code for 3.2 acres.

Article 7.1.3.G.4 SW-6 Max footprint – 50,0000

SW-6 – 50,000 SF Standard

The project conforms to the form-based code because the proposed development occupies approximately 19,000 SF.

Conclusion

Under SW-5 (30,000 SF) and SW-6 (50,000 SF) standards, the total between the two zones is 80,000 sf. This project and proposed development is **60,000 total** for max footprint. The overall design and footprint meet the vision of the SW waterfront form-based code and is below the allowable total ‘max footprint’ development area.

Article 7.1.3.F.6 & 7.1.3.G.6– Building Entries – Ground Level - Min 70% transparent glass at the ground level on the principal frontage.

The provided elevations show a ground floor glazing calculation of 71%; however, there is a note that suggests that the ground floor area of the garage was excluded from the calculations. The ground floor area of the garage shall be included in the calculations, and the complete ground floor transparency calculation is unable to be determined on your elevation plan. Our updated ground floor glazing elevation reaches 63% due to the slope perpendicular to Dawson Street exceeding 22%.

Corner Activation Narrative

The Sevier/Dawson corner will serve as a primary activation point for development, transforming the existing condition through thoughtful architectural and hardscape enhancements. The design establishes a dynamic connection between the historic “ghost stairs” and the proposed east-west pedestrian corridor, strengthening pedestrian access to the project’s core public spaces while creating a more engaging streetscape experience.

A central feature of this connection is the existing rock pile, which will be preserved and elevated as a distinctive landmark element. Integrated landscape lighting will enhance its visual character and improve safety and visibility at the corner. Complementing this feature will be a signature public art installation — a large-scale bicycle sculpture, as an example — celebrating the area’s artistic identity while reinforcing the prominence of the adjacent bike lane and multimodal connectivity. Working with local sculptors to curate the most impactful installation for this area.

Together, these elements support the broader vision for Knoxville’s SW Waterfront District by creating a memorable gateway experience that blends art, placemaking, and pedestrian connectivity.

Design Intent

- Activate the Sevier corner as a prominent public and visual focal point.
- Strengthen connectivity between the historic ghost stairs and east-west pedestrian circulation.
- Enhance safety, visibility, and character through integrated landscape lighting.
- Celebrate local culture, creativity, and multimodal connectivity through public art.
- Support and reinforce the long-term vision for the SW Waterfront District.



Zoning Administrator Report for Level III: Alternative Compliance Review

315 Kerbela Avenue

Peter Ahrens, Director
City of Knoxville, Plans Review and Building Inspections

I. Background

The parcel located at 315 Kerbela Avenue lies within the South Waterfront Form-Based Code and is uniquely situated within both the SW-5 (*Bell Tower Walk*) and SW-6 (*Henley Gateway*) zoning districts. This parcel is the only property within the South Waterfront Form-Based Code area that contains contiguous multiple zoning designations that has been redeveloped since the adoption of the South Waterfront Form-Based Code and the establishment of the Administrative Review Committee.

The vision and intent for the SW-5 district is to create a “window-to-the-water” from the Baptist Church on Sevier Avenue leading down to the riverfront. New buildings are organized along the civic plaza called “Bell Tower Walk” and are oriented perpendicular to the river so as not to inhibit views to the river from the bluff. The Bell Tower Walk is the center of a lively area on the Knoxville South Waterfront where outdoor restaurants, fairs and musical events attract local Knoxvilleans and regional visitors both day and night and year round. Low to mid-rise, mixed-use or multiple unit housing developments face this linear open space and are encouraged to have commercial development on the first floor.

The vision and intent for the SW-6 district is to establish a new entrance into downtown Knoxville, as well as a Chapman Highway gateway leading south to the Smoky Mountains. Capitalizing on the presence and economic opportunities of the Baptist Hospital, this area shall host multi-story office buildings, attracting new businesses to South Knoxville. A high-rise hotel with sweeping river views could accommodate business professionals as well as a multitude of city visitors. New mid-rise towers facing the park are envisioned as a compliment to the surrounding institutional uses and to the scale of the Baptist Hospital. Landscaped plazas not only provide professionals with pleasant lunchtime spaces, but also establish a pedestrian-friendly connection from City View to Bell Tower Walk and Waterfront Marketplace.

II. Process

In the Form Based Code Districts, Article 7.0.2.G.1 states that, “*Alternative Compliance Review is intended to allow developments and nonprohibited uses that would not otherwise be allowed under a strict interpretation of the Form District regulations but nevertheless comply with the intent of the applicable Form District and Plan.*”

Due to site-specific topographical conditions and the property’s unique characteristic as a large, contiguous parcel zoned within both the SW 5 and SW 6 districts, each with distinct visions, intents, and Zoning Ordinance requirements, a strict interpretation of the Ordinance is not practicable. Accordingly, the proposed development has been submitted as a Level III: Alternative Compliance Review.

III. Administrative Review Committee

The application and project drawings were distributed to members of the Administrative Review Committee on March 18, 2026. On March 30, 2026, the initial ARC review was completed and comments were sent to the applicant. A revised plan was

submitted on April 27, 2026, and the second ARC review began the following day. The following comments were identified and provided to the applicant on May 5, 2026:

- Article 7.1.3.F.3.a/b & 7.1.3.G.3.a/b - Guide lot layout and outline the maximum block perimeter and building setbacks permitted in this district to ensure walkable neighborhoods. Block size -Maximum perimeter of 1,400 feet. This development appears to exceed the maximum block size perimeter of 1,400 feet. The development will need to be subdivided or this development will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 & 7.1.3.G.4 – Lot Size Max – 3 acres. This development exceeds the lot size maximum for both the SW-5 and SW-6 district of 3 acres and will need to be subdivided or this development will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 – Footprint/Floorplate (max) – 30,000sf; does not apply to structured parking. This development exceeds the footprint/floorplate max of 30,000sf on the SW-5 zoned portion of the property with a provided measurement of 39,000sf (overall total 58,000sf). This standard will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.G.4 – Footprint/Floorplate (max) – 50,000sf; does not apply to structured parking. Based on previous discussions, this development may exceed the footprint/floorplate maximum and without specific details it is not possible to verify at this time. Please provide additional information regarding this standard. If the development does exceed the maximum this will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 & 7.1.3.G.4–Principal Building Siting – Front Setback – 0'. The site plan provided shows a front setback of 69'-0" from Sevier Avenue. This does not meet the front setback standard and will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 –Principal Building Siting – Frontage at Setback (min) – 75% to River Rd. and Sevier Ave. The site plan provided shows the building sited beyond the front setback and therefore the development does not meet the frontage at setback minimum of 75%. This will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.4 & 7.1.3.G.4 –Principal Building Siting – Side Setback (max) – 25'. The site plan provided shows the building sited at 56'-0" from the Dawson St. interior side lot line and the building sited 32'-0" from the eastern interior lot line both of which are over the maximum side setback of 25'. This will need approval as a Level III: Alternative Compliance Review.
- Article 7.1.3.F.6 & 7.1.3.G.6– Building Entries – Ground Level - Min 70% transparent glass at the ground level on the principal frontage. The provided elevations show a ground floor glazing calculation of 71%; however, there is a note that suggests that the

ground floor area of the garage was excluded from the calculations. The ground floor area of the garage shall be included in the calculations and the complete ground floor transparency calculation is unable to be determined on your elevation plan. Please provide a transparency calculation that includes the garage ground floor area. If the calculation is less than 60%, it will need approval as a Level III: Alternative Compliance Review.

- **(INFO ONLY)** Article 7.1.3.F.9.b & 7.1.3.G.9.b – Sustainability – Green Building and Landscape – Capable of attaining the current Leadership in Energy and Environmental Design (LEED) minimal Performance Level of "Certified." Applicant has provided a draft LEED Certification with a target certification of silver (50 points). A formal certification will be reviewed during permitting.
- Article 7.1.3.F.9.c & 7.1.3.G.9.c – Sustainability – Reflectivity, Heat Island Reduction, Roof and Surface Lots. Surface lots shall provide shade and/or use light-colored/high albedo materials with a solar reflectance of at least 0.3 (30%). Applicant has indicated that a mix of pervious and impervious materials will be used for the surface parking lot; however, specific details regarding the materials used and their capability of meeting this standard have not been provided. Please provide additional details regarding the materials being used to show that compliance will be met.
- Article 7.1.3.F.9.c & 7.1.3.G.9.c – Sustainability – Roofs shall use an Energy Star Compliant (highly reflective) for a minimum of 75% of the roof surface. Please provide specific details regarding the materials used for roofing and how they will meet this standard.
- Minimum ROW sidewalk width is 5 feet. Additional sidewalk width, landscape strip width, or other ROW impacts will be subject to detailed design review and may require modifications to the widths and layouts shown as part of the ARC submittal. Deferral of that detailed ROW review is acceptable at this time to allow ARC and Planning Committee review to proceed, with the understanding that those approvals would not be impacted by revised ROW improvements, provided onsite structure locations and required setbacks remain unchanged.
- When scaled, at least two locations still appear to exceed 2H:1V slopes. Detailed design review may require additional retaining walls so as not to impact the site layout.
- In accordance with Sections D106.2 and D106.3 of Appendix D in the 2024 International Fire Code, two separate and approved fire apparatus access roads are required for this project. If the two access points/parking lots do not connect, then approved turnarounds must be provided.
- Please provide dimensions verifying the remoteness required by IFC D106.3.
- A landscape plan is required for ARC review in order to determine if the landscape-specific requirements of the form-based code will be met.

- o If exact species to be planted are not known at this time, trees and shrubs can be represented by symbols that show proposed quantities, locations, and spacing and additional details can be added at a later date. At minimum, trees should be denoted as shade trees (mature height 50ft or greater) or ornamental (mature height <50ft) or evergreen. The plan should show any trees to be preserved, as well. Include a schedule including the quantities of all proposed trees and shrubs.
 - o See additional comments for a list of code requirements.
- The Tree Protection Ordinance will apply for the total property size. The exact size was not provided and the lot is not platted, but an estimate based on KGIS of ~5.75 acres is used for the calculations below.
 - o Sec. 14-34(b) requires preservation of 6 trees per acre which would be ~35 trees for the total estimated property size. There are few trees that could count toward preservation along the hillside, but not 35 total. Any that are preserved will count proportionally toward the planting requirement in Section 14-36 (8 trees per acre) which would be a total of ~46 trees, half of which must reach a mature height of 50ft or greater.
 - o Article 7.1.3.F.2.c.ii. also requires preservation of either 1 healthy large tree per lot or 6 per acre, whichever is greater (6/ac is greater in this case and will be applied in accord with the Tree Protection Ordinance since the requirement is the same).
 - o We will want to see diversity in the tree species selected. Use the requirements in Article 12.4.B as a guide.
 - o Planting space and terrain was expressed as a concern. Because the site is large and varied and will be excavated for building construction, space for trees should be included in the excavation. Tree pits can be dug out similar to downtown street trees or soil can be added on top of the rock. Tree species that can grow with limited root space include eastern redcedar, catalpa, overcup oak, ginkgo, Frontier elm, Kentucky coffeetree, trident maple, and others.
- The general development standards in Article 7.1.4.D.1. require:
 - o b. A visual buffer of landscaping between surface parking and adjacent properties
 - o This will apply to the west parking area where 8 parking spaces abut the adjacent lot.

- o c. Any parking lot adjoining a public street shall be screened from view to a height of 3 feet by walls, berms or landscaping or a combination of these 3. If landscaping only is used, the planting bed shall be a minimum of 10 feet wide.
 - This will apply to the west parking area that most closely abuts Kerbela Ave.
- o d. Separate parking areas from buildings by use of a raised walkway or planting strip. Avoid directly abutting parking aisles or spaces to the edge of a building.
 - This will apply where parking abuts the building.
- The vision plan lists streets as ST-42-24-PL to the east and west. This also applies to the corner side Dawson St. Article 7.1.5.D. requires street trees at 30' OC, 5' wide continuous planting strip for this street type. We will defer to Engineering and Zoning for whether the planting strip will be required along the sidewalks.
- o Note that street trees in the ROW (outside of private property) do not normally count toward the density requirements listed above. If the planting strip is not required by Engineering, the trees that would have been planted in the ROW can potentially be incorporated along the property lines but on private property to serve some of the same intent (provide shade for the walking paths, creating the tree-lined street aesthetic, reduced noise, etc.).

IV. Administrator Action

In Article 7.0.2.G.6.c, "the Administrator must prepare a report that reviews the application in light of comments provided by the Administrative Review Committee, and in light of the applicable Form District and Plan. The report recommendations, and any related application materials must be forwarded to the Knoxville-Knox County Planning Commission."

The applicant is continuously working with the Administrative Review Committee to resolve outstanding comments that do not necessitate approval through a Level III: Alternative Compliance Review by the Planning Commission. These items will remain under review by the Administrative Review Committee until the proposal satisfies all applicable standards, including Stormwater Engineering and Urban Forestry requirements, and final approval is granted.

Article 7.1.2 describes the Vision Plan Executive Summary as follows: *"The Knoxville South Waterfront Vision and Action Plan is an effort to develop, through extensive public involvement, a coordinated plan and realistic series of prioritized actions to improve the waterfront area across from downtown. The plan is not intended to be rigid and inflexible. The basic framework of the plan describes a series of public transportation and open space improvements designed to allow access and views to the water throughout the South*

Waterfront. The plan is designed to accommodate a realistic range of market-driven redevelopment over the next 20 years."

In contrast, the vision and intent statements for the individual districts reference former structures and unimplemented concepts that are no longer applicable, including the former Baptist Hospital, a cultural center, a museum, an outdoor amphitheater, and a high-rise hotel. This divergence reflects a departure from the flexible, long-range framework established in the Vision Plan Executive Summary, which was intended to guide, rather than rigidly prescribe, the vision and intent for each district.

In addition, the development team has met with members of the South Waterfront community regarding the proposed development. Consideration of the community's feedback has resulted in the current proposal, which reflects a reduction in both overall height and massing compared to the original submission. The development team has also committed to enhancing public access and connectivity, including a pedestrian linkage to Kern's Food Hall, preservation of the historic stairs, and the incorporation of an east-west connection to maintain views of the Tennessee River.

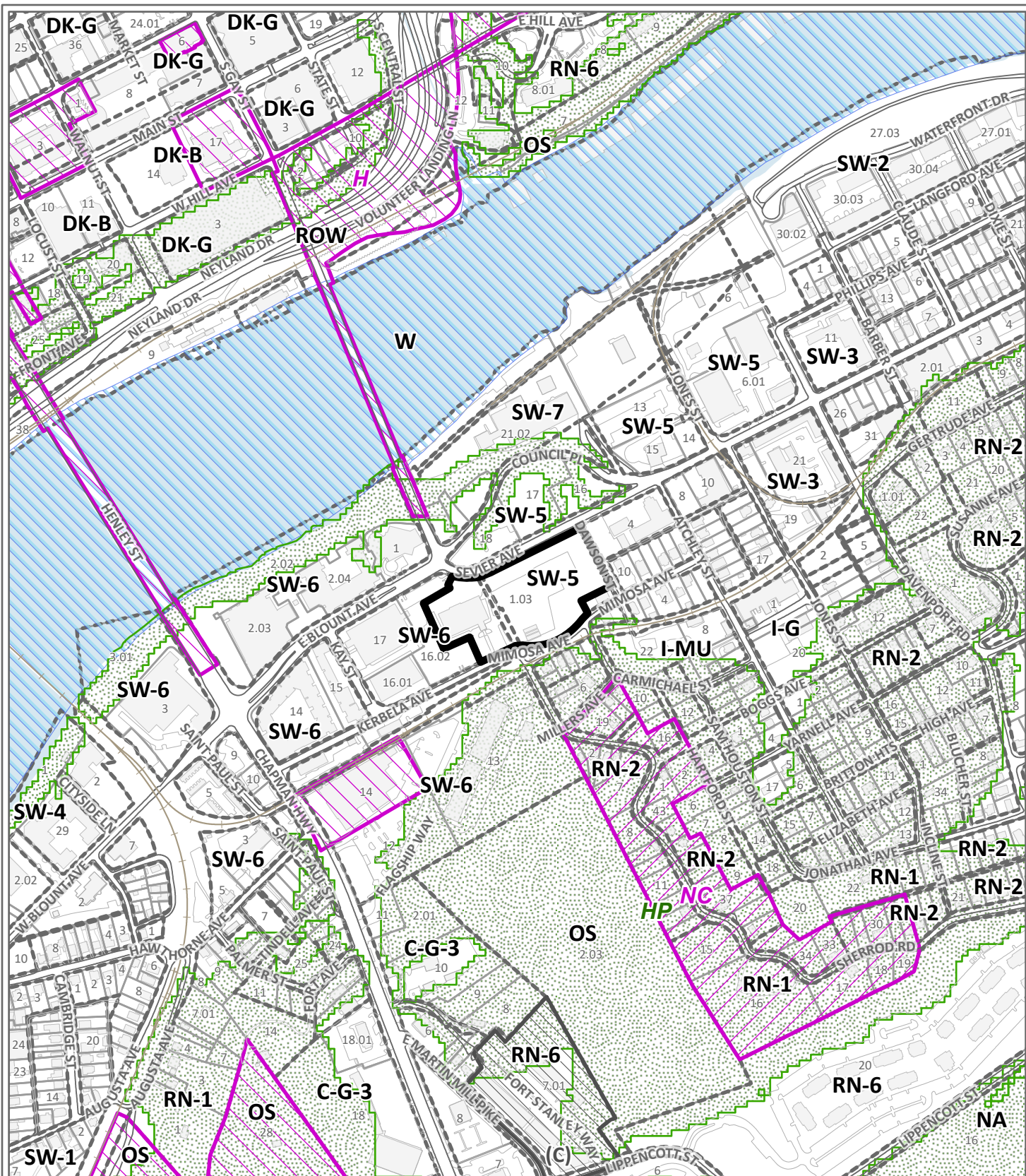
As previously noted, the subject property presents unique conditions in that it is zoned within both the SW-5 and SW-6 districts, each of which prescribes differing principal siting standards pursuant to Article 7.1.3.F and G of the Zoning Ordinance. Furthermore, the applicant has identified site-specific topographical constraints that complicate construction along the required build-to street frontages that would otherwise be expected to accommodate commercial spaces.

It is the Administrator's recommendation that the Planning Commission consider the proposed Level III: Alternative Compliance Review in light of these unique site conditions, the applicant's ongoing coordination with the Administrative Review Committee, and the efforts undertaken to address both regulatory requirements and community input in regards to massing and public connectivity.

Respectfully,



Peter M. Ahrens
Director of Plans Review and Inspections



OTHER BUSINESS

4-A-26-OB

Petitioner: Ryan Robertson



Purpose of Request: Level III Alternative Compliance Review in the SW-6 and SW-5 (South Waterfront) district for a proposed multi-family development

Original Print Date: 3/2/2026

Knoxville - Knox County Planning Commission * City / County Building * Knoxville, TN 37902

Map No: 109

Jurisdiction: City

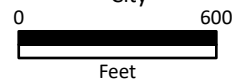


Exhibit A. Contextual Images



AERIAL MAP



Case boundary

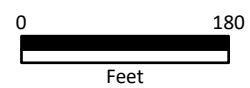
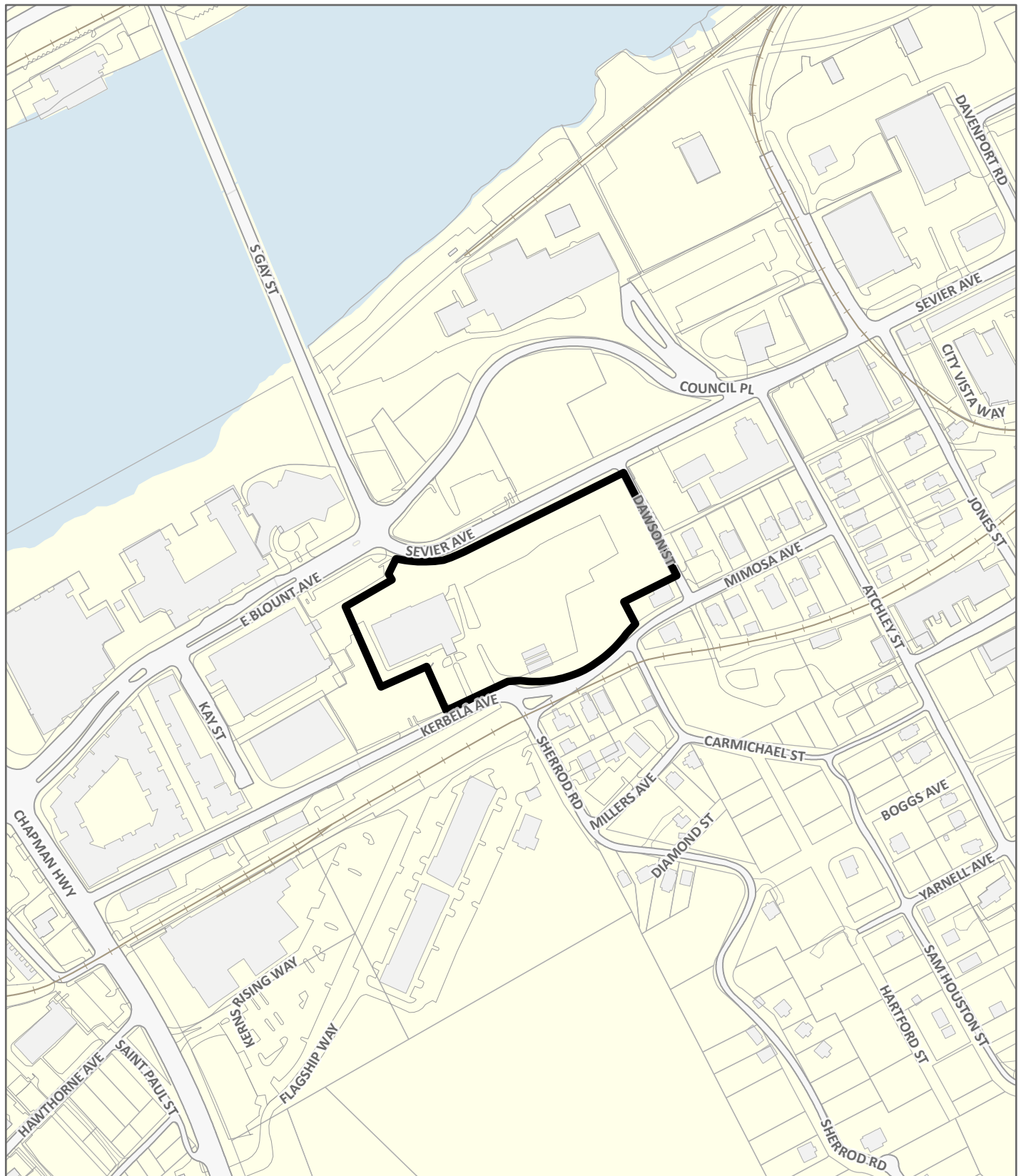


Exhibit A. Contextual Images



LOCATION MAP

4-A-26-OB



Case boundary

0 360
Feet





MEMORANDUM

Date: 05/13/2026
TO: Knoxville-Knox County Planning Commission
FROM: Peter Ahrens, Director of Plans Review & Inspections
RE: 315 Kerbela

Project Introduction:

The purpose of this communication is to reiterate the role of the Planning Commission in its consideration of the proposed development at 315 Kerbela Avenue under a Level III Alternative Compliance Review.

Process:

Pursuant to Article 7.0.2.G of the Zoning Ordinance, the Planning Commission's responsibility is to evaluate whether the proposed development, while not compliant with the strict interpretation of the form district regulations, nevertheless complies with the intent of the form district plan and the approval criteria.

Context:

The Planning Commission should recognize that the property is split-zoned between the SW 5 and SW 6 districts, making it uniquely situated within the South Waterfront. Each district carries distinct visions, intents, and siting standards, and applying these standards to a single large parcel creates practical challenges not typically encountered on smaller, single-zoned properties.

If the site were subdivided into compliant parcels and the building(s) were sited in accordance with the code's prescriptive requirements, a development of comparable scale and intensity could largely be achieved by right. Therefore, the request before the Planning Commission is not fundamentally about use or density, but rather about flexibility in site design and building placement across a unified development, as opposed to a fragmented, prescriptive approach.

Additionally, the site presents significant topographical challenges, including steep slopes and elevation changes, which limit the ability to fully comply with build-to lines, frontage requirements, and other siting standards without substantial grading or impractical design solutions.

The development team has also engaged in an ongoing design process with both staff and members of the surrounding community. In response to feedback, the applicant has made significant revisions, including reductions in building height and massing, and has incorporated enhancements to public access and connectivity, including pedestrian linkages, preservation of existing features, and efforts to maintain views toward the Tennessee River.

Recommendation:

The Administrator respectfully submits that this request represents a circumstance in which alternative compliance is appropriate, not as a means to circumvent the ordinance, but to enable a cohesive

development that might otherwise be achieved in a more fragmented and less coordinated manner under strict compliance.

Planning Commission Evaluation Process:

In summary, the Commission's review should focus on whether the development meets the established approval criteria, while also recognizing the unique site conditions, split zoning, and design considerations that necessitate an alternative compliance approach. The applicable approval criteria are as follows:

- i. Consistency with the applicable adopted Plan;
- ii. That the development will not have a substantial or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety, and general welfare;
- iii. That the development will be constructed and operated in a manner compatible with the district;
- iv. That the proposed development can be adequately served by public facilities;
- v. That the proposed development will not result in the destruction, loss, or damage of any significant natural, scenic, or historical district, site, or feature;
- vi. Compliance with the intent of the applicable Form District and Plan (see attached Vision and Intent sections);
- vii. Compliance with all applicable Zoning Ordinance requirements;
- viii. Compliance with all applicable Subdivision regulations;
- ix. Compliance with the Major Road Plan;
- x. Compliance with the One Year Plan; and
- xi. Compliance with the Stormwater and Street Ordinance.



TO: City of Knoxville Administrative Review Committee
FROM: Knoxville-Knox County Planning
DATE: May 20, 2026
PLANNING FILE #: 4-A-26-OB
SUBJECT: 315 Kerbela Ave. – Level III Alternative Compliance Review

At its May 14, 2026, meeting, the Knoxville-Knox County Planning Commission referred the Level III Alternative Compliance Review back to the Administrative Review Committee for further consideration. The Planning Commission reviewed each item identified as requiring a Level III Alternative Compliance Review approval. Below is a summary of the comments provided for each.

The Commission's discussion and comments focused primarily on block size, building scale, and public access through the site. While the Commission had little discussion and stated there is no concern with some of the requested modifications, these may be more of a point of discussion if the primary concern of allowing north/south public access through the site is not addressed.

SUMMARY OF COMMENTS

- **Article 7.1.3.F.3.a/b & 7.1.3.G.3.a/b – SW5 and SW6 Districts, Block Size Max (perimeter) – 1,400 feet**

The Planning Commission did not believe it was necessary to subdivide the lot to accommodate the maximum block size perimeter of 1,400 feet if the site design were adjusted. Several commissioners interested in enhanced connectivity said they could be more flexible on the building size and massing if the site plan provided more connectivity, noting the current plan's lack of engagement with the surrounding community. The single building was identified in the discussion as a barrier to increased walkability in the area, particularly relating to bicycle and pedestrian connections between the Gay Street Bridge and the neighborhoods and apartment complexes along Mimosa and Kerbela Avenues. It was noted that the block size and the building's layout, being placed horizontally to the river, resulted in a building of a massive scale. Several Commissioners recommended separating the structure into two or more buildings to provide north/south access, perpendicular to the river. Public spaces like an arcade or a plaza were mentioned as potential site amenities that could facilitate connectivity and connection within the site.

- **Article 7.1.3.F.4 & 7.1.3.G.4 – SW5 and SW6 Districts, Lot Size Max – 3 acres**

The lot size was less of a concern than providing opportunities for north/south connectivity through the site.

- **Article 7.1.3.F.4 – SW5 District, Building Siting and Configuration, related to Building Footprint/Floorplate (max) – 30,000 sf**

Several Commissioners noted concerns that the building's footprint/floorplate exceeds the 30,000 sf maximum allowed. It was again suggested that the development be separated into two or more smaller buildings and perhaps make the buildings taller to make up for lost floor space.

- **Article 7.1.3.G.4 – SW6 District, Building Siting and Configuration, related to Building Footprint/Floorplate (max) – 50,000 sf**

The Planning Commission lacked sufficient information to evaluate the request and recommended that the applicant submit additional information to the Administrative Review Committee.

- **Article 7.1.3.F.4 & 7.1.3.G.4 – SW5 and SW6 Districts, Principal Building Siting and Configuration, related to Front Setback – 0'**

The Planning Commission recognized the site constraints and the challenges this presented to complying with the strict requirements of these two articles.

- **Article 7.1.3.F.4 – SW5 District, Principal Building Siting and Configuration, related to Building Frontage at Setback (min) – 75% to Sevier Ave**

The Planning Commission recognized the site constraints and the challenges they presented to strict compliance with this article.

- **Article 7.1.3.F.4 & 7.1.3.G.4 – SW5 and SW6 Districts, Principal Building Siting and Configuration related to Side Setback (max) – 25'**

The Planning Commission recognized the site constraints and the challenges this presented to complying with the strict requirements of these two articles.

- **Article 7.1.3.F.6 & 7.1.3.G.6 – SW5 and SW6 Districts, Building Entries (Building Envelope Articulation) – Min 70% transparent glass at the ground level on the principal frontage**

Several Commissioners expressed the need to activate the corner of Sevier Avenue and Dawson Street. One suggested solution was to build out the ground floor to allow conversion to commercial use later.

Note that during the meeting, it was stated that the transparency requirement was met at 62%, but the minimum is 70%.



Revised Notes and Code Compliance Summary

Article 7.1.3.F.4 & 7.1.3.G.4

Comment

Providing a north/south connection through the site is not considered a practical or architectural solution. The slope exceeds 20% on both the east and west boundaries of the site and increases to greater than 40% down toward the center.

An east-west connection is proposed, connecting with the existing “ghost” stairs and incorporating a gathering plaza for public use (see Exhibit).

Article 7.1.3.F.4- SW-5 Building site (footprint) Max 30,000 sf

Site Area and Building Footprint

- 30,000 SF
- The proposed five-level structure has an approximate 39,000 SF footprint.
- The site totals approximately 5.7 acres, with only 3.2 acres considered buildable area.
- The 39,000 SF footprint represents approximately 15% of the total acreage and roughly 27% of the 3.2 buildable acres. The form-based code allows for 23% per 3 acres - within SW-5 for max footprint- this deviate proportionally with the additional .2 acres to 27% footprint, a hardship of **4%**. The vision was 30,000 per 3 acres, at 3.2 usable are allows for 8,612 sf and the project is at **9,000 sf**. above the max allowed.
- Although the proposal exceeds 30,000 SF, the overall area is consistent with the intent of the form-based code for 3.2 acres.

Article 7.1.3.G.4 SW-6 Max footprint – 50,0000

SW-6 – 50,000 SF Standard

The project conforms to the form-based code because the proposed development occupies approximately 19,000 SF.

Conclusion

Under SW-5 (30,000 SF) and SW-6 (50,000 SF) standards, the total between the two zones is 80,000 sf. This project and proposed development is **60,000 total** for max footprint. The overall design and footprint meet the vision of the SW waterfront form-based code and is below the allowable total ‘max footprint’ development area.

Article 7.1.3.F.6 & 7.1.3.G.6– Building Entries – Ground Level - Min 70% transparent glass at the ground level on the principal frontage.

The provided elevations show a ground floor glazing calculation of 71%; however, there is a note that suggests that the ground floor area of the garage was excluded from the calculations. The ground floor area of the garage shall be included in the calculations, and the complete ground floor transparency calculation is unable to be determined on your elevation plan. Our updated ground floor glazing elevation reaches 63% due to the slope perpendicular to Dawson Street exceeding 22%.

Corner Activation Narrative

The Sevier/Dawson corner will serve as a primary activation point for development, transforming the existing condition through thoughtful architectural and hardscape enhancements. The design establishes a dynamic connection between the historic “ghost stairs” and the proposed east-west pedestrian corridor, strengthening pedestrian access to the project’s core public spaces while creating a more engaging streetscape experience.

A central feature of this connection is the existing rock pile, which will be preserved and elevated as a distinctive landmark element. Integrated landscape lighting will enhance its visual character and improve safety and visibility at the corner. Complementing this feature will be a signature public art installation — a large-scale bicycle sculpture, as an example — celebrating the area’s artistic identity while reinforcing the prominence of the adjacent bike lane and multimodal connectivity. Working with local sculptors to curate the most impactful installation for this area.

Together, these elements support the broader vision for Knoxville’s SW Waterfront District by creating a memorable gateway experience that blends art, placemaking, and pedestrian connectivity.

Design Intent

- Activate the Sevier corner as a prominent public and visual focal point.
- Strengthen connectivity between the historic ghost stairs and east-west pedestrian circulation.
- Enhance safety, visibility, and character through integrated landscape lighting.
- Celebrate local culture, creativity, and multimodal connectivity through public art.
- Support and reinforce the long-term vision for the SW Waterfront District.



TO: City of Knoxville Administrative Review Committee
FROM: Knoxville-Knox County Planning
DATE: July 17, 2026
PLANNING FILE #: 4-A-26-OB
SUBJECT: 315 Kerbela Ave. – Level III Alternative Compliance Review

At its July 9, 2026, meeting, the Knoxville-Knox County Planning Commission referred the Level III Alternative Compliance Review back to the Administrative Review Committee for further consideration.

At the Commission's request, any request for alternative compliance shall include an item-by-item list of the requested deviations, an explanation of the purpose of each standard, and a justification for how the proposal meets the criteria for approval for each standard.

The developer was encouraged to review the Commission's comments, proposed conditions of approval, and the comments surrounding the form and massing. In addition to the summary below, the video recording of the Planning Commission meeting is at the following link:
<https://vimeo.com/1209606231?share=copy&fl=cl&fe=ci#t=1386.001>

SUMMARY OF DISCUSSION AND COMMENTS

1. Building form and pedestrian engagement
 - a. This proposal does not embody the intent of the vision plan: a lively, mixed-use, pedestrian-friendly, human-scale project.
 - b. The facades are flat and unarticulated. The code encourages balconies, porches, bay windows, and other projections because they provide the architecture with definition, which is currently missing.
 - c. There is a lack of interest in the facades - they are flat with overly simple material articulation
 - d. In agreement with community concerns with scale.
 - e. The long, horizontal orientation of the proposed building is an impediment to accessing the waterfront.
 - f. The project separates itself from the public with the plaza levels and tunnel that cuts through the site. This is an unfriendly way to make this connection.
 - g. The intent of the dimensional standards is to ensure walkable neighborhoods, that public ROW remains open, connectivity is fostered, and is never dependent on private control. A tunnel is pushing the limit on what can be considered.
 - h. There was a desire for greater emphasis on the mixing of public-private spaces.
 - i. The intent of the code is for lively public and private engagement.
 - j. There could be more engagement with the street. This has not been fully explored.
2. Retail/commercial

- a. Topography and the location being on the outer edge of two commercial areas make commercial uses challenging on this site. Examples of similar situations in the downtown area were provided.
 - b. The end product should not be a consideration but rather adherence to the code. A building's use can change over time.
 - c. Currently, this location may not support dense retail; however, it is incumbent upon the [Planning Commission] to enable this future evolution and the potential of the site.
 - d. It would be beneficial to provide some ground-floor space that could be converted to commercial uses in the future.
- 3. Clarity of the request
 - a. Concern with the structure of the alternative compliance request and process.
 - b. Needed: an item-by-item explanation or justification of why alternative compliance is appropriate, and what that alternative compliance is.
- 4. Site constraints and general challenges
 - a. Topography
- 5. Public engagement
 - a. Would like to see more communication with the SWAAG group before the next meeting.

SUMMARY OF PROPOSED CONDITIONS

1. Prior to the issuance of permits, the applicant shall coordinate with the Register of Deeds to establish and record a public access easement covering the entire north-south connection.
2. The public access area shall remain open daily during certain hours, with “Dawn-Dusk” and “6 am – 11 pm” as considerations. No gate, lock, or other access-control measures shall restrict public access during these hours, except for temporary closures required for maintenance or public safety.
3. Permanent wayfinding signage shall be installed, identifying the area as open to the public and directing visitors to the entrance and observation deck.
4. The tunnel interior, ghost stairs, plaza, and other publicly accessible areas shall be illuminated in accordance with applicable City standards.
5. The recommendations of the Traffic Impact Study shall be incorporated into the development plan and completed prior to the issuance of any applicable building permits.



7.27.26

Re: Kerbela Development, Knoxville, TN.

Dear Commissioners,

We appreciate the opportunity to submit our revised proposal for review and consideration. As requested, prior to this submission, we met in person with SWAAG in Knoxville for nearly three hours. During that meeting, we listened with an open mind, carefully considered the perspectives and concerns raised by members of the public, and made meaningful revisions to the project wherever reasonably possible.

We believe the revised proposal is consistent with the vision and intent of the South Waterfront and reflects a thoughtful response to both the unique characteristics of the site and the feedback we have received throughout this process.

In developing the revised plan, we have carefully considered the approximately 3.1 acres of buildable area available due to the site's significant topographical constraints. Within that limited buildable footprint, the project establishes a north-south pedestrian connection through the site as well as an east-west connection across the property, improving connectivity and accessibility while furthering the broader goals of the South Waterfront.

We believe these revisions demonstrate our continued commitment to creating a project that is responsive to its surroundings, respectful of community input, and supportive of the long-term vision for the South Waterfront.

Below, you will find our detailed responses to the questions, comments, and feedback provided by SWAAG and Councilwoman Adams following the conclusion of our in-person meeting. You will also find updated graphics and elevations attached for your review.

FOR REVIEW:

1.- Higher Resolution provided- additional details need to be designed and thought out for the corner and final landscape design.

-  [Kerbela Dawson view-.pdf](#) - Link to Higher Resolution image

2. Corner of Dawson & Sevier Avenue. Can you provide some bullets or brief narrative about this image and these aspects?

The concept illustrates several enhancements intended to create a more active and pedestrian-oriented corner condition, including:

- Increased transparency and architectural lighting along the garage frontage.
- Enhanced landscaping
- A public plaza/gathering area at the corner of Dawson and Sevier. Size and specifics TBD

- Opportunities for flexible community-oriented programming, including food truck activity.
- Improved pedestrian circulation and connectivity. - the plaza can terminate with the Ghost Trail- further public movement/engagement though east to west trail and up form Sevier Ave and Ghost stairs.

3. There is concern that these are all items for the city to complete. Can that be clarified?

-- Any proposed improvements within the public right-of-way would require coordination and approval by the City and applicable agencies; however, the concept reflects a collaborative design approach between the development team and public agencies. Final responsibilities and implementation would be determined through the design and permitting process.

4. Food truck accommodation on Sevier may be problematic due to future two-way traffic. Is there a way to integrate this into the site?

Given the site's topography and existing retaining wall conditions, integrating food truck space directly into the hillside portion of the site would be challenging and likely not cost-effective. While modifications such as a curb extension or corner bulb-out on the corner are more feasible, significant excavation into the hillside to create dedicated food truck areas is not considered practical.

5. Have there been any modifications to the garage building at the ground floor?

Yes. The concept includes increased transparency along portions of the garage frontage, enhanced architectural lighting, (lighting would be architectural down lighting and landscape uplighting) pedestrian-scale street lighting, landscape improvements, and other streetscape enhancements intended to improve the pedestrian experience

6. Building Massing (separate Bldgs.)

The development remains two separate buildings. The perspective shown in the rendering is taken from the corner of Dawson and Sevier and does not fully illustrate the separation between the two primary building masses. The buildings remain distinct and are connected only by a lower-scale element between the main wings.

7. Dawson Street Frontage

The primary design refinements along Dawson Street focus on creating a more pedestrian-friendly experience through:

- Enhanced streetscape and landscape improvements.
- Additional lighting and pedestrian plaza

- Increased activation at key corner (Dawson/Sevier) and gathering areas.
- The focus was on the corner activation per SWAAGs direction.

TO: Knoxville-Knox County Planning

FROM: CR Endeavors

DATE: July 31, 2026

PLANNING FILE: #4-A-26-OB

SUBJECT: 315 Kerbela Ave. – Level III Alternative Compliance Review

1. *Building form and pedestrian engagement a. This proposal does not embody the intent of the vision plan: a lively, mixed-use, pedestrian-friendly, human-scale project.*

- The project has been carefully designed to leverage the site's unique topography, history, and waterfront setting to create a pedestrian-oriented experience that is both authentic and connected to place. A primary objective of the design was/is to illuminate, celebrate, and activate the historic Ghost Stairs while strengthening access to the Ghost Trail through enhanced east-west connectivity.
 - The public will be able to access and experience the five remaining historic stairways, which connect to the east-west Ghost Trail corridor at the upper portion of the site. These improvements allow visitors to move across much of the property, enjoy views of the waterfront and downtown Knoxville, and experience the site's historic landscape in a way that is not possible today.
 - The project also includes new landscape lighting, pedestrian-scale lighting, enhanced sidewalks, streetscape improvements, and public realm enhancements that encourage walking, exploration, and social interaction. These improvements strengthen connections between the Gay Street Bridge, Bell Walk, Ghost Trail, Dawson Street, and Sevier Avenue while creating a safer and more inviting environment.
 - Additionally, a public plaza and flexible gathering space at the corner of Dawson Street and Sevier Avenue is proposed to accommodate food trucks, community events, and informal gathering opportunities. Together, these elements create a vibrant and welcoming public environment that advances the Vision Plan's goals for pedestrian engagement, placemaking, and activation.
- ***The facades are flat and unarticulated. The code encourages balconies, porches, bay windows, and other projections because they provide the architecture with definition, which is currently missing.***
- The building has been intentionally designed with a variety of architectural elements that provide articulation, scale, and visual interest while responding to the site's character and topography.
 - Key design features include:
 - Private balconies throughout the building.
 - Three primary building masses that project and recess to create depth and variation.
 - Distinct stone-clad architectural elements that establish strong visual anchors and frame key portions of the building.
 - Board-and-batten detailing and material transitions that introduce texture and shadow.
 - Variations in façade planes, roof forms, and materials that reduce the perceived scale of the structure.
 - These elements work together to create a well-articulated building composition that satisfies the intent of the design standards while establishing an elegant architectural character that complements the surrounding landscape and waterfront setting.

- ***There is a lack of interest in the facades - they are flat with overly simple material articulation***
 - The architectural approach began with the site's natural topography and landscape features as primary organizing elements. Due to the site's steep grades, limited buildable areas, and overall configuration, the building necessarily follows portions of the site in a more horizontal orientation. However, considerable effort has been made to reduce the perception of length and create a more varied architectural composition.
 - Consistent with prior SWAAG recommendations, the building mass has been divided into distinct east and west wings connected by a central lobby element. This strategy significantly reduces the appearance of a continuous façade while creating visual breaks and opportunities for architectural expression.
 - The façade design incorporates:
 - Stone-clad building elements at the primary wings.
 - Board-and-batten materials are arranged in both vertical and horizontal patterns.
 - Balconies and projecting architectural features.
 - Material transitions and shadow lines that create depth and texture.
 - Detailed architectural elements that respond to the site's historic and natural context.
 - Together, these components create visual interest, reduce the perceived scale of the building, and establish an architectural language appropriate for the South Waterfront.
- ***In agreement with community concerns with scale.***
 - The project team carefully considered community feedback regarding scale throughout the design process. In response to recommendations from SWAAG and other stakeholders, the building mass was intentionally divided into separate east and west wings connected by a lower-scale central lobby element.
 - This design approach successfully breaks down the overall building mass, reducing the perceived scale of the development and allowing the architecture to respond more naturally to the site's topography. Rather than appearing as a single continuous structure, the building reads as a collection of components integrated into the landscape.
 - In addition, the project remains substantially below the maximum development capacity permitted under the adopted zoning and Vision Plan framework. Approximately 80,000 square feet of allowable development has intentionally been left undeveloped, demonstrating a measured approach that balances redevelopment objectives with the site's physical character and community context.
- ***The long, horizontal orientation of the proposed building is an impediment to accessing the waterfront.***
 - The building's orientation is primarily influenced by the site's topography, environmental constraints, existing circulation patterns, and available buildable areas. Rather than restricting access, the project introduces new pedestrian connections and public amenities that substantially improve movement through the site.
 - The design activates key public pathways, including Bell Walk and the Ghost Trail, while creating a prominent north-south connection through the development. The building's placement preserves important views, reinforces existing circulation patterns, and allows public access routes to remain visible and accessible.
 - It is also important to recognize that this property does not provide direct access to the waterfront. The Riverwalk currently terminates near the Gay Street Bridge, and access to the river from this location requires travel through adjacent properties and future segments of the planned South Waterfront trail system. Consistent with the Vision Plan, the proposed project

enhances connectivity by improving access to Bell Walk, the Ghost Trail, and the Gay Street Bridge while supporting future connections contemplated by the broader South Waterfront network.

- The proposed breezeway, trail connections, improved stairways, and public realm enhancements collectively provide greater public access and connectivity than currently exists on the site today.
- ***The project separates itself from the public with the plaza levels and tunnel that cuts through the site. This is an unfriendly way to make this connection.***
 - The project was designed to balance public accessibility, safety, operational considerations, and the site's significant topographic challenges. The north-south breezeway is not intended as a tunnel, but rather as an open and inviting pedestrian passage that provides a meaningful connection through the site.
 - The connector includes:
 - a. Open-air design elements.
 - b. Public gathering spaces.
 - c. Landscape enhancements.
 - d. Enhanced lighting and visibility.
 - e. Elevator and stair access.
 - f. Visual connections to surrounding views and public spaces.
 - g. Together, these features create an active pedestrian environment that encourages movement through the site while providing opportunities to experience the site's unique history, topography, and relationship to the waterfront.
- ***The intent of the dimensional standards is to ensure walkable neighborhoods, that public ROW remains open, connectivity is fostered and is never dependent on private control. A tunnel is pushing the limit on what can be considered.***
 - The intent of the dimensional standards is to ensure walkable neighborhoods, that public right-of-way remains open, connectivity is fostered and is never dependent on private control. A tunnel is pushing the limit on what can be considered.
 - Response:
 - The project supports the intent of the dimensional standards by improving pedestrian connectivity and enhancing public access throughout the site. The proposed breezeway functions as a publicly accessible pedestrian connection that links important destinations and supports the circulation network envisioned in the Vision Plan.
 - The design strengthens both north-south and east-west movements while preserving and enhancing public access opportunities associated with Bell Walk, the Ghost Trail, and surrounding pedestrian routes. The project's approach prioritizes preservation of the site's natural landforms while investing in sidewalks, lighting, landscape improvements, and public pathways and sidewalks that make the site more walkable and accessible than it is today.
 - Rather than limiting public access, the project introduces new public connections and infrastructure that enhance connectivity throughout a site characterized by significant topographic constraints.
- ***There was a desire for greater emphasis on the mixing of public-private spaces.***
 - The project incorporates multiple locations where public and private uses interact in a thoughtful and purposeful manner. Public amenities including the plaza, food truck area,

breezeway, Bell Walk improvements, Ghost Trail activation, and gathering spaces create opportunities for residents and visitors to share and enjoy the site while maintaining appropriate levels of privacy for residential uses.

- This balanced approach promotes activity and engagement while respecting the operational and residential functions of the development.
- ***The intent of the code is for lively public and private engagement.***
 - The project strongly advances this objective through the creation of active public spaces, enhanced pedestrian circulation, improved lighting, expanded landscaping, and opportunities for community gathering and interaction.
 - The corner plaza, food truck accommodations, publicly accessible breezeway, trail connections, pedestrian pathways, and outdoor gathering spaces collectively create a vibrant environment that encourages interaction among residents, visitors, and the broader community. These improvements are fully consistent with both the intent of the zone code and the broader goals of the South Waterfront Vision Plan.
- ***There could be more engagement with the street. This has not been fully explored.***
 - The project team carefully evaluated opportunities to strengthen street-level activation and incorporated a variety of improvements intended to enhance the relationship between development and the public realm.
 - These improvements include:
 - A public plaza at the prominent intersection of Sevier Avenue and Dawson Street.
 - Flexible space for food trucks and community-oriented programming.
 - Enhanced sidewalks and pedestrian circulation routes.
 - Pedestrian-scale lighting.
 - New landscaping and streetscape improvements.
 - Improved connections to Bell Walk, the Ghost Trail, and surrounding pedestrian networks.
 - Given the site's steep topography, environmental constraints, and limited street frontage, the project strikes an appropriate balance between public activation and site functionality. The result is a development that enhances pedestrian experience, strengthens public connections, and contributes to the broader placemaking and walkability goals established in the Vision Plan.

2. *Concern with the structure of the alternative compliance request and process.*

Needed: an item-by-item explanation or justification of why alternative compliance is appropriate, and what that alternative compliance is.

- The Form Based Code was not implemented with properties with the topographical challenges of this lot in mind. All of the requested items for relief under alternative compliance are necessary because of the site-specific issues involving the lot size and topography. Any development on this property would need the same relief either through alternative compliance or variances with the possible exception of the glazing requirement. We are only ~7% out of compliance with the 70% requirement. Because the intent of the ground floor glazing requirement is to facilitate/promote ground floor retail at appropriate locations; however, ground floor retail is not required of the code, and this property is ill-suited for ground floor retail given its location and topographical challenges.
-

5. Public engagement- Would like to see more communication with the SWAAG group before the next meeting.

- Community engagement has been a priority throughout the planning and design of this project. Early in the process, we hosted two public meetings at the Shriners Temple to welcome representatives of SWAAG, surrounding neighborhoods, and the greater South Knoxville community. To provide multiple opportunities for participation, we held one meeting in the evening and a second the following morning, with each lasting more than two hours. More than 300 people attended the two meetings.

At these meetings, we presented our proposed plan and had members of our development and design team available to speak directly with residents, answer questions, hear concerns, and receive feedback firsthand.

At the specific request of Councilwoman Adams and SWAAG, our team subsequently returned to Knoxville for an additional meeting at the Shriners Temple lasting more than two hours. That meeting included members of our team, SWAAG representatives, KCDC, and Councilwoman Adams and provided another opportunity for focused discussion regarding the project and the community's priorities.

Following the conclusion of the most recent Planning Commission meeting, we again traveled to Knoxville and spent more than two hours meeting with SWAAG representatives, city leadership, and Councilwoman Adams to continue that dialogue and further understand the issues and recommendations raised throughout the review process.

Throughout this process, we have made it a priority to listen, absorb the feedback we have received, and thoughtfully evaluate where changes can be made. We have invested significant time in direct engagement with the community and its representatives, and we have made a good-faith effort to incorporate that feedback wherever reasonably possible into our plans and our submission to the Planning Commission.

While not every comment or request can necessarily be accommodated within the physical, financial, and operational constraints of the site, we believe the plan before the Planning Commission reflects a meaningful evolution of the project and demonstrates our commitment to listening, collaborating, and responding to the South Knoxville community.

SUMMARY OF PROPOSED CONDITIONS

1. ***Prior to the issuance of permits, the applicant shall coordinate with the Register of Deeds to establish and record a public access easement covering the entire north-south connection.***

- Understand and concur.

2. ***The public access area shall remain open daily during certain hours, with “Dawn-Dusk” and “6 am – 11 pm” as considerations. No gate, lock, or other access-control measures shall restrict public access during these hours, except for temporary closures required for maintenance or public safety.***

- We remain comfortable establishing operating hours from dawn to dusk, consistent with the operating hours generally observed by public parks throughout the City of Knoxville. We believe this provides reasonable public access to the space while also establishing clear and appropriate hours that respect the surrounding neighborhood and future residents of the community.

3. ***Permanent wayfinding signage shall be installed, identifying the area as open to the public and directing visitors to the entrance and observation deck.***

- Understand and concur.

4. ***The tunnel interior, ghost stairs, plaza, and other publicly accessible areas shall be illuminated in accordance with applicable City standards.***

- Understand and concur.

5. ***The recommendations of the Traffic Impact Study shall be incorporated into the development plan and***

- Per last planning meeting, should a traffic impact study be required by the city related to our proposed development, we will execute and provide necessary documentation for the request.

Exhibit H. Applicant's Response to Planning Commission Comments

TO: Knoxville-Knox County Planning
FROM: CR Endeavors/Ben Mullins
DATE: August 5, 2026
PLANNING FILE # : 4-A-26-OB

SUBJECT: 315 Kerbela Ave. – Level III Alternative Compliance Review
Supplement to ARC Compliance Justifications

***Planning Comment: Concern with the structure of the alternative compliance request and process.
Needed: an item-by-item explanation or justification of why alternative compliance is appropriate, and what that alternative compliance is.***

Applicant's Executive Summary:

The areas noted for alternative compliance have been identified as:

1. Increase the block size from a maximum of 1400' to 3000'.
2. Increase the maximum lot size from 3 acres to 5.7 acres.
3. Increase the maximum building footprint from 30,000 sq. ft. to 39,000 sq. ft. in the SW5 portion of the lot.
4. Increase the maximum front setback from 0' to 69' from Sevier Avenue.
5. Reduce the minimum building frontage at the setback from 75% to 0%.
6. Increase the maximum side setback from 25' to 56' from the Dawson Street interior side lot line and 32' from the eastern interior lot line.
7. Reduce the ground level transparent glass on the principal frontage from 70% to 63%.

Numbers 1 through 6 above are all necessary, and justified, because of the unique size, topography, and situation of the lot. The form-based code was not implemented with properties with the topographical challenges of this lot in mind. Virtually any development on this lot within the SW 5 or SW6 zones would need relief from the strict compliance of the first 6 items above because of its size and topography. Even if the property were subdivided to meet the current maximum block size and lot size requirements, the setbacks could not be met absent leveling the entire lot to street level. The first 6 items all share the same explanation and justification.

Number 7 above, the glazing/fenestration requirement, is related to the first 6 but different because the intent of the ground floor glazing requirement is to facilitate/promote ground floor retail at appropriate locations; however, ground floor retail is not required of the code, and this property is ill-suited for ground floor retail given its location and topographical challenges. We are close to the requirement as proposed, ~63% of the required 70%, and space could be converted in the future to accommodate ground-floor commercial in the unlikely event that the use changes or the circumstances present a greater opportunity and demand for ground-floor retail.

The following is an itemized explanation of the ARC request and justification for alternative compliance pursuant to Article 7.02.G.8.a

1. Increase the block size from a maximum of 1400' to 3000'.
 - a. A block is a tract of land bounded by streets, or a combination of streets and railroad rights-of-way, municipal boundary lines, and/or waterways, and blockface is measured as that portion of a block or tract of land facing the same side of a single street and lying between the closest intersecting streets.

- b. The existing lot's block size is 3000'. This cannot be reduced absent subdividing the property or creating a new public street through the center of the property. The lot is also essentially a plateau and set apart and above other properties in the vicinity.
- c. The form-based code was not implemented with properties of this size or with its unique topographical conditions, and it is an anomaly among the current lots.
- d. Pursuant to the approval criteria of 7.02.8.a:
 - i. Any applicable plans were adopted with this property, and its block size, already established. The development is not creating any inconsistency with the applicable adopted plans. Neither the General Plan, the One-Year Plan, or the South City Sector Plan have specifically codified or adopted by reference the South Waterfront Vision plan.
 - ii. The block size will not have a substantial or undue adverse or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare. The existing block size cannot create any adverse impacts because it was out of compliance at the time the form-based code was adopted.
 - iii. The development will be constructed and operated to be compatible with the district. The existing district was created with this property's block size out of compliance.
 - iv. The proposed development can be adequately served by public facilities. The block size does not affect this.
 - v. The proposed development's block size will not result in the destruction, loss or damage of any significant natural, scenic, or historical district, site or feature. The JFG sign has already been relocated from the site and the property is not in any historic overlay or district. The block size does not affect this criterion.
 - vi. While the block size is larger than allowed in the form district and plan, the plans were adopted with this property, and its block size, already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.
 - vii. While the block size is larger than allowed in the current zoning ordinance, the plans were adopted with this property, and its block size, already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.
 - viii. The subdivision regulations are not applicable to this project.
 - ix. The project is in compliance with the Major Road Plan.
 - x. The project is in compliance with the One-Year Plan. The One-Year Plan has not codified or adopted by reference the South Waterfront Vision Plan.
 - xi. The project will comply with the stormwater and street ordinances as needed. The existing block size is not creating any issues with these ordinances.

2. Increase the maximum lot size from 3 acres to 5.7 acres.

- a. The entire site is 5.7 acres, but due to topographical constraints, only ~3.2 acres are able to be built or developed upon.
 - b. This cannot be reduced absent subdividing the existing lot, which is split-zoned between the SW5 and SW6 zoning districts.
 - c. Pursuant to the approval criteria of 7.02.8.a:
 - i. Any applicable plans were adopted with this property, and its existing acreage, already established. The development is not creating any inconsistency with the applicable adopted plans. Neither the General Plan, the One-Year Plan, or the South City Sector Plan have specifically codified or adopted by reference the South Waterfront Vision plan.
 - ii. The existing acreage will not have a substantial or undue adverse or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare. The existing acreage cannot create any adverse impacts because it was out of compliance at the time the form-based code was adopted.
 - iii. The development will be constructed and operated to be compatible with the district. The existing district was created with this property's acreage out of compliance.
 - iv. The proposed development can be adequately served by public facilities. The acreage does not affect this.
 - v. The proposed development's acreage will not result in the destruction, loss or damage of any significant natural, scenic, or historical district, site or feature. The JFG sign has already been relocated from the site, and the property is not in any historic overlay or district. The acreage does not affect this criterion.
 - vi. While the block size is larger than allowed in the form district and plan, the plans were adopted with this property, and its acreage were already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.
 - vii. While the block size is larger than allowed in the current zoning ordinance, the plans were adopted with this property, and its acreage, already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.
 - viii. The subdivision regulations are not applicable to this project.
 - ix. The project is in compliance with the Major Road Plan.
 - x. The project is in compliance with the One-Year Plan. The One-Year Plan has not codified or adopted by reference the South Waterfront Vision Plan.
 - xi. The project will comply with the stormwater and street ordinances as needed. The existing acreage is not creating any issues with these ordinances.
3. Increase the maximum building footprint from 30,000 sq. ft. to 39,000 sq. ft. in the SW5 portion of the lot.

- a. The proposed five-level structure has an approximate 39,000 SF footprint. The site totals approximately 5.7 acres, with only 3.2 acres considered buildable area. The 39,000 SF footprint represents approximately 15% of the total acreage and roughly 27% of the 3.2 buildable acres. The form-based code allows for 23% per 3 acres - within SW-5 for max footprint- this deviates proportionally with the additional .2 acres to the 27% footprint. The vision was 30,000 per 3 acres, at 3.2 usable are allows for 8,612 sf and the project is at 9,000 *sf.* above the max allowed.
- b. Although the proposal exceeds 30,000 SF, the overall area is consistent with the intent of the form-based code for 3.2 acres.
- c. Pursuant to the approval criteria of 7.02.8.a:
 - i. The development is not creating any inconsistency with the applicable adopted plans. Neither the General Plan, the One-Year Plan, or the South City Sector Plan have specifically codified or adopted by reference the South Waterfront Vision plan. Moreover, although the 39,000 sf footprint exceeds what the code allows, due to the size of the lot, and its developable area, it is proportional to the allowable footprints on other lots.
 - ii. The increased footprint will not have a substantial or undue adverse or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare. Although the 39,000 sf footprint exceeds what the code allows, due to the size of the lot, and its developable area, it is proportional to the allowable footprints on other lots.
 - iii. The development will be constructed and operated to be compatible with the district. The existing district was created with this property's acreage out of compliance. The footprint is proportional to what is allowed on other properties in the district.
 - iv. The proposed development can be adequately served by public facilities. The footprint does not affect this.
 - v. The proposed development footprint will not result in the destruction, loss or damage of any significant natural, scenic, or historical district, site or feature. The JFG sign has already been relocated from the site, and the property is not in any historic overlay or district.
 - vi. While the block size is larger than allowed in the form district and plan, the plans were adopted with this property, and its acreage were already established. The development is not creating any inconsistency with the applicable adopted plans. The footprint is proportional to what would be allowed with smaller lots.
 - vii. While the block size is larger than allowed in the current zoning ordinance, the plans were adopted with this property, and its acreage, already established. The development is not creating any inconsistency with the applicable adopted plans other than what is created by the larger lot
 - viii. The subdivision regulations are not applicable to this project.

- ix. The project is in compliance with the Major Road Plan.
- x. The project is in compliance with the One-Year Plan. The One-Year Plan has not codified or adopted by reference the South Waterfront Vision Plan.
- xi. The project will comply with the stormwater and street ordinances as needed. The existing acreage is not creating any issues with these ordinances.

4. Increase the maximum front setback from 0' to 69' from Sevier Avenue.

- a. The property is a plateau with a ~` 40 ft drop in elevation along its frontage to Sevier Ave. Absent extensive regrading of the property to reduce its elevations by several feet, the property, no development could meet this setback. Moreover, if the property were to be significantly regraded to allow the setbacks to be met, the view from the property and the character of the property's "ghost stairs" would be significantly impacted or destroyed.
- b. The form-based code was not implemented with properties of this size or with its unique topographical conditions, and it is an anomaly among the current lots.
- c. Pursuant to the approval criteria of 7.02.8.a:
 - i. Any applicable plans were adopted with this property, and its topography, already established. The development is not creating any inconsistency with the applicable adopted plans. Neither the General Plan, the One-Year Plan, nor the South City Sector Plan have specifically codified or adopted by reference the South Waterfront Vision plan.
 - ii. The existing topography will not have a substantial or undue adverse or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare. The existing topography cannot create any adverse impacts because it was out of compliance at the time the form-based code was adopted.
 - iii. The development will be constructed and operated to be compatible with the district. The district was created with this property's existing topography. It is relatively unique and requires either a variance or for alternative compliance.
 - iv. The proposed development can be adequately served by public facilities. The topography does not affect this.
 - v. The proposed development's topography will not result in the destruction, loss or damage of any significant natural, scenic, or historical district, site or feature. The JFG sign has already been relocated from the site and the property is not in any historic overlay or district. Rather grading to meet this setback would result in a significant impact to its view of downtown and the river and require the destruction of the ghost stairs.
 - vi. The plans were adopted with this property, and its topographical conditions, already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.

- vii. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing because of the topographical conditions of the property.
 - viii. The subdivision regulations are not applicable to this project.
 - ix. The project is in compliance with the Major Road Plan.
 - x. The project is in compliance with the One-Year Plan. The One-Year Plan has not codified or adopted by reference the South Waterfront Vision Plan.
 - xi. The project will comply with the stormwater and street ordinances as needed. The existing topography will not prevent compliance with these ordinances.
5. Reduce the minimum building frontage at the setback from 75% to 0%.
- a. For all of the reasons noted in number 4 above, it is impossible to place 75% of the building frontage at the existing setback.
 - b. The form-based code was not implemented with properties of this size or with its unique topographical conditions, and it is an anomaly among the current lots.
 - c. Pursuant to the approval criteria of 7.02.8.a:
 - i. Any applicable plans were adopted with this property, and its topography, already established. The development is not creating any inconsistency with the applicable adopted plans. Neither the General Plan, the One-Year Plan, nor the South City Sector Plan have specifically codified or adopted by reference the South Waterfront Vision plan.
 - ii. The existing topography will not have a substantial or undue adverse or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare. The existing topography cannot create any adverse impacts because it was out of compliance at the time the form-based code was adopted.
 - iii. The development will be constructed and operated to be compatible with the district. The district was created with this property's existing topography. It is relatively unique and requires either a variance or alternative compliance.
 - iv. The proposed development can be adequately served by public facilities. The topography does not affect this.
 - v. The proposed development's topography will not result in the destruction, loss or damage of any significant natural, scenic, or historical district, site or feature. The JFG sign has already been relocated from the site and the property is not in any historic overlay or district. Rather grading to meet this setback would result in a significant impact to its view of downtown and the river and require the destruction of the ghost stairs.
 - vi. The plans were adopted with this property, and its topographical conditions, already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.

- vii. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing because of the topographical conditions of the property.
- viii. The subdivision regulations are not applicable to this project.
- ix. The project is in compliance with the Major Road Plan.
- x. The project is in compliance with the One-Year Plan. The One-Year Plan has not codified or adopted by reference the South Waterfront Vision Plan.
- xi. The project will comply with the stormwater and street ordinances as needed. The existing topography will not prevent compliance with these ordinances.

6. Increase the maximum side setback from 25' to 56' from the Dawson Street interior side lot line and 32' from the eastern interior lot line.

- a. The property is a plateau with an ~` 15 ft drop in elevation along its frontage to Dawson Street. Absent extensive regrading of the property to reduce its elevations by several feet, the property, no development could meet these setbacks and minimum building frontage requirements. Moreover, if the property were to be significantly regraded to allow the setbacks to be met, the view from the property would be significantly impacted or destroyed.
- b. The form-based code was not implemented with properties of this size or with its unique topographical conditions, and it is an anomaly among the current lots.
- c. Pursuant to the approval criteria of 7.02.8.a:
 - i. Any applicable plans were adopted with this property, and its topography, already established. The development is not creating any inconsistency with the applicable adopted plans. Neither the General Plan, the One-Year Plan, nor the South City Sector Plan have specifically codified or adopted by reference the South Waterfront Vision plan.
 - ii. The existing topography will not have a substantial or undue adverse or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare. The existing topography cannot create any adverse impacts because it was out of compliance at the time the form-based code was adopted.
 - iii. The development will be constructed and operated to be compatible with the district. The district was created with this property's existing topography. It is relatively unique and requires either a variance or alternative compliance.
 - iv. The proposed development can be adequately served by public facilities. The topography does not affect this.
 - v. The proposed development's topography will not result in the destruction, loss or damage of any significant natural, scenic, or historical district, site or feature. The JFG sign has already been relocated from the site and the property is not in any historic overlay or district. Rather grading to meet this setback would result in a significant impact to its elevated views of downtown and the river.

- vi. The plans were adopted with this property, and its topographical conditions, already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.
- vii. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing because of the topographical conditions of the property.
- viii. The subdivision regulations are not applicable to this project.
- ix. The project is in compliance with the Major Road Plan.
- x. The project is in compliance with the One-Year Plan. The One-Year Plan has not codified or adopted by reference the South Waterfront Vision Plan.
- xi. The project will comply with the stormwater and street ordinances as needed. The existing topography will not prevent compliance with these ordinances.

7. Reduce the ground level transparent glass on the principal frontage from 70% to 63%.

a. Number 7 above, the glazing/fenestration requirement, is related to the first 6 but different because the intent of the ground floor glazing requirement is to facilitate/promote ground floor retail at appropriate locations; however, ground floor retail is not required of the code, and this property is ill-suited for ground floor retail given its location and topographical challenges. We are close to the requirement as proposed, ~63% of the required 70%, and space could be converted in the future to accommodate ground-floor commercial in the unlikely event that the use changes or the circumstances present a greater opportunity and demand for ground-floor retail.

a. Pursuant to the approval criteria of 7.02.8.a:

- i. The development is not creating any inconsistency with the applicable adopted plans. Neither the General Plan, the One-Year Plan, nor the South City Sector Plan have specifically codified or adopted by reference the South Waterfront Vision plan. While the glazing is intended to encourage ground floor retail, it is not required.
- ii. The existing topography will not have a substantial or undue adverse or undue adverse effect upon the neighborhood, the character of the area, traffic conditions, parking, public infrastructure, and other matters affecting the public health, safety and general welfare. The existing topography makes ground floor retail impractical and likely unsustainable.
- iii. The development will be constructed and operated to be compatible with the district. The district was created with this property's existing topography which creates a natural hinderance for ground floor retail.
- iv. The proposed development can be adequately served by public facilities. Neither the topography or the glazing requirements affects this condition.
- v. The proposed development's topography will not result in the destruction, loss or damage of any significant natural, scenic, or historical district, site or feature. The JFG sign has already been relocated from the site and the property is not in any

historic overlay or district. Rather grading to meet this setback would result in a significant impact to its elevated views of downtown and the river.

- vi. The plans were adopted with this property, and its topographical conditions, already established. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing.
- vii. The development is not creating any inconsistency with the applicable adopted plans other than what was pre-existing because of the topographical conditions of the property.
- viii. The subdivision regulations are not applicable to this project.
- ix. The project is in compliance with the Major Road Plan.
- x. The project is in compliance with the One-Year Plan. The One-Year Plan has not codified or adopted by reference the South Waterfront Vision Plan.
- xi. The project will comply with the stormwater and street ordinances as needed. The existing topography will not prevent compliance with these ordinances.

Planning Commission- 7.27.26

SWAAG Feedback on the North-South Connector – Remove Separation Between Private and Public Spaces

Response: The project team and design professionals carefully evaluated opportunities to further integrate public and private spaces along the north-south connector and incorporated refinements where feasible. However, more substantial modifications would require extensive ADA-accessible ramping, grading, retaining walls, and significant construction costs due to the site's challenging topography.

We believe the proposed north-south breezeway fulfills the intent of the Vision Plan by providing a meaningful public connection through the site while balancing accessibility, safety, operational needs, and physical site constraints. The connector breezeway includes:

- A generous exterior stair and elevator providing access to the breezeway.
- A thoughtfully designed public passage with open-air elements.
- Gathering spaces and viewing opportunities at key locations.
- A north-south pedestrian connection that integrates with the broader public realm and access to the east west 'Ghost Trail'- that can be accessed from both the north and South Streets.

Adding ADA-accessible connections beyond what is currently proposed is neither feasible nor practical. A fully accessible route connecting Sevier Avenue, the courtyard, the Ghost Trail, and Dawson Street would require:

- Hundreds of feet of additional ADA-compliant ramping.
- Extensive retaining walls and structural improvements.
- Significant grading and site modifications.
- Substantial construction and long-term maintenance costs.

Such improvements would be disproportionate to the public benefit and would fundamentally alter the site's natural topography and historic character.

The proposed design instead:

- Enhances the public experience through improved lighting and site infrastructure.
- Provides meaningful north-south pedestrian connectivity.
- Preserves and activates the historic Bell Walk.
- Highlights the Ghost Trail corridor.
- Celebrates the site's unique landscape, views, and topography.

Conclusion

The project team carefully considered SWAAG's feedback and incorporated modifications where feasible and appropriate. The proposed design:

- Enhances the public realm through improved pedestrian experiences and activation opportunities.

- Provides meaningful north-south and east-west connectivity.
- Improves lighting, landscaping, and public infrastructure.
- Preserves and activates the historic Bell Walk.
- Recognizes and highlights the Ghost Trail corridor.
- Protects the site's unique topography, views, and natural features.

Consistent with Michael Graves' human-centered design philosophy, the project prioritizes authentic experiences, memorable places, and meaningful connections to the site's history and landscape. We believe the proposed design successfully fulfills the intent of the Vision Plan while preserving the character-defining features that make this site an important part of the SouthWest Waterfront.

7.27.26

Re: Kerbela Development, Knoxville, TN.

Dear Commissioners,

We appreciate the opportunity to submit our revised proposal for review and consideration. As requested, prior to this submission, we met in person with SWAAG in Knoxville for nearly three hours. During that meeting, we listened with an open mind, carefully considered the perspectives and concerns raised by members of the public, and made meaningful revisions to the project wherever reasonably possible.

We believe the revised proposal is consistent with the vision and intent of the South Waterfront and reflects a thoughtful response to both the unique characteristics of the site and the feedback we have received throughout this process.

In developing the revised plan, we have carefully considered the approximately 3.1 acres of buildable area available due to the site's significant topographical constraints. Within that limited buildable footprint, the project establishes a north-south pedestrian connection through the site as well as an east-west connection across the property, improving connectivity and accessibility while furthering the broader goals of the South Waterfront.

We believe these revisions demonstrate our continued commitment to creating a project that is responsive to its surroundings, respectful of community input, and supportive of the long-term vision for the South Waterfront.

Below, you will find our detailed responses to the questions, comments, and feedback provided by SWAAG and Councilwoman Adams following the conclusion of our in-person meeting. You will also find updated graphics and elevations attached for your review.

FOR REVIEW:

1.- Higher Resolution provided- additional details need to be designed and thought out for the corner and final landscape design.

-  [Kerbela Dawson view-.pdf](#) - Link to Higher Resolution image

2. Corner of Dawson & Sevier Avenue. Can you provide some bullets or brief narrative about this image and these aspects?

The concept illustrates several enhancements intended to create a more active and pedestrian-oriented corner condition, including:

- Increased transparency and architectural lighting along the garage frontage.
- Enhanced landscaping
- A public plaza/gathering area at the corner of Dawson and Sevier. Size and specifics TBD

- Opportunities for flexible community-oriented programming, including food truck activity.
- Improved pedestrian circulation and connectivity. - the plaza can terminate with the Ghost Trail- further public movement/engagement though east to west trail and up form Sevier Ave and Ghost stairs.

3. There is concern that these are all items for the city to complete. Can that be clarified?

-- Any proposed improvements within the public right-of-way would require coordination and approval by the City and applicable agencies; however, the concept reflects a collaborative design approach between the development team and public agencies. Final responsibilities and implementation would be determined through the design and permitting process.

4. Food truck accommodation on Sevier may be problematic due to future two-way traffic. Is there a way to integrate this into the site?

Given the site's topography and existing retaining wall conditions, integrating food truck space directly into the hillside portion of the site would be challenging and likely not cost-effective. While modifications such as a curb extension or corner bulb-out on the corner are more feasible, significant excavation into the hillside to create dedicated food truck areas is not considered practical.

5. Have there been any modifications to the garage building at the ground floor?

Yes. The concept includes increased transparency along portions of the garage frontage, enhanced architectural lighting, (lighting would be architectural down lighting and landscape uplighting) pedestrian-scale street lighting, landscape improvements, and other streetscape enhancements intended to improve the pedestrian experience

6. Building Massing (separate Bldgs.)

The development remains two separate buildings. The perspective shown in the rendering is taken from the corner of Dawson and Sevier and does not fully illustrate the separation between the two primary building masses. The buildings remain distinct and are connected only by a lower-scale element between the main wings.

7. Dawson Street Frontage

The primary design refinements along Dawson Street focus on creating a more pedestrian-friendly experience through:

- Enhanced streetscape and landscape improvements.
- Additional lighting and pedestrian plaza

- Increased activation at key corner (Dawson/Sevier) and gathering areas.
- The focus was on the corner activation per SWAAGs direction.

SWAAG Feedback on the North-South Connector – Remove Separation Between Private and Public Spaces

Response: The project team and design professionals carefully evaluated opportunities to further integrate public and private spaces along the north-south connector and incorporated refinements where feasible. However, more substantial modifications would require extensive ADA-accessible ramping, grading, retaining walls, and significant construction costs due to the site's challenging topography.

We believe the proposed north-south breezeway fulfills the intent of the Vision Plan by providing a meaningful public connection through the site while balancing accessibility, safety, operational needs, and physical site constraints. The connector breezeway includes:

- A generous exterior stair and elevator providing access to the breezeway.
- A thoughtfully designed public passage with open-air elements.
- Gathering spaces and viewing opportunities at key locations.
- A north-south pedestrian connection that integrates with the broader public realm and access to the east west 'Ghost Trail'- that can be accessed from both the north and South Streets.

Adding ADA-accessible connections beyond what is currently proposed is neither feasible nor practical. A fully accessible route connecting Sevier Avenue, the courtyard, the Ghost Trail, and Dawson Street would require:

- Hundreds of feet of additional ADA-compliant ramping.
- Extensive retaining walls and structural improvements.
- Significant grading and site modifications.
- Substantial construction and long-term maintenance costs.

Such improvements would be disproportionate to the public benefit and would fundamentally alter the site's natural topography and historic character.

The proposed design instead:

- Enhances the public experience through improved lighting and site infrastructure.
- Provides meaningful north-south pedestrian connectivity.
- Preserves and activates the historic Bell Walk.
- Highlights the Ghost Trail corridor.
- Celebrates the site's unique landscape, views, and topography.

Conclusion

The project team carefully considered SWAAG's feedback and incorporated modifications where feasible and appropriate. The proposed design:

- Enhances the public realm through improved pedestrian experiences and activation opportunities.

- Provides meaningful north-south and east-west connectivity.
- Improves lighting, landscaping, and public infrastructure.
- Preserves and activates the historic Bell Walk.
- Recognizes and highlights the Ghost Trail corridor.
- Protects the site's unique topography, views, and natural features.

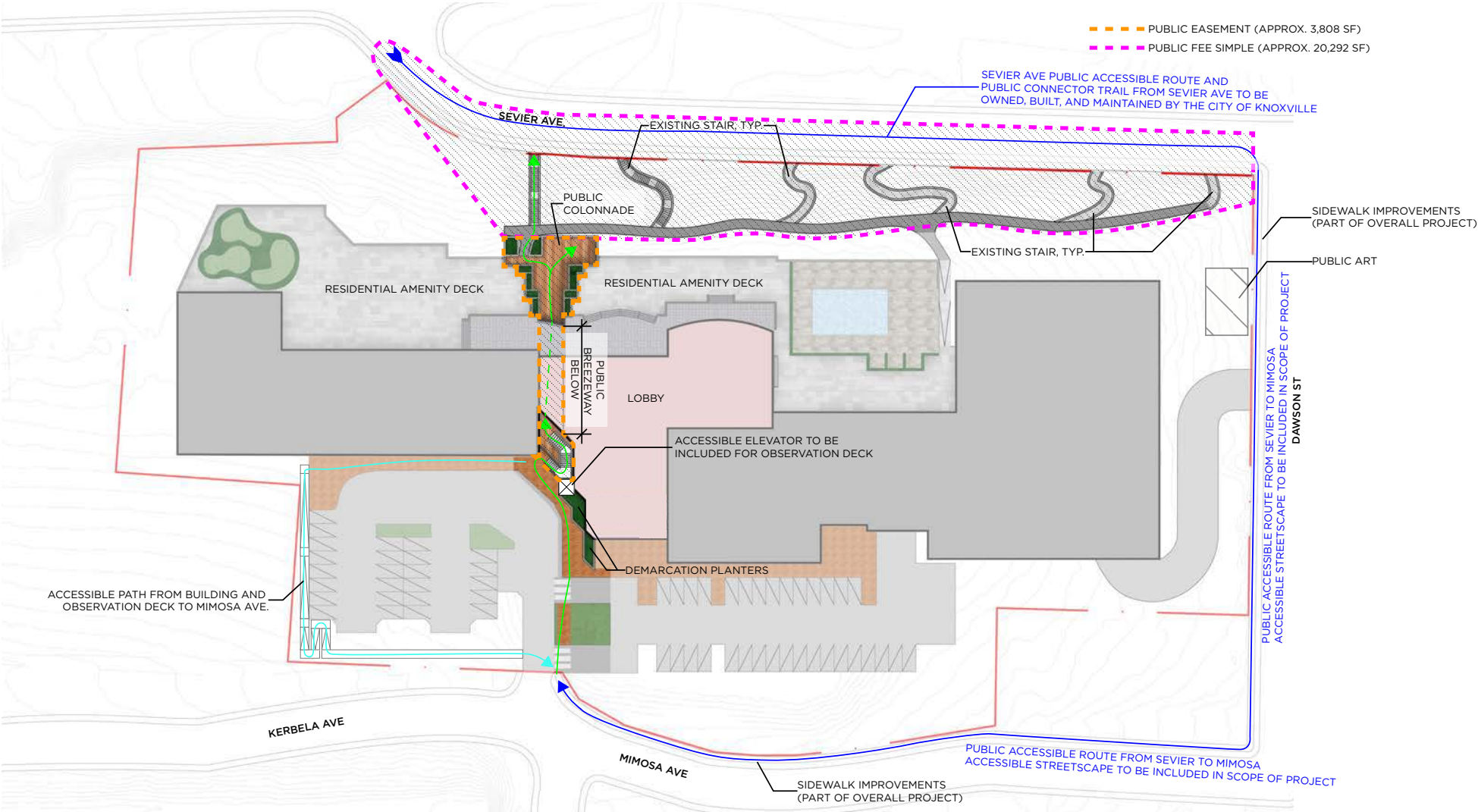
Consistent with Michael Graves' human-centered design philosophy, the project prioritizes authentic experiences, memorable places, and meaningful connections to the site's history and landscape. We believe the proposed design successfully fulfills the intent of the Vision Plan while preserving the character-defining features that make this site an important part of the SouthWest Waterfront.

4-A-26-OB
7/27/2026

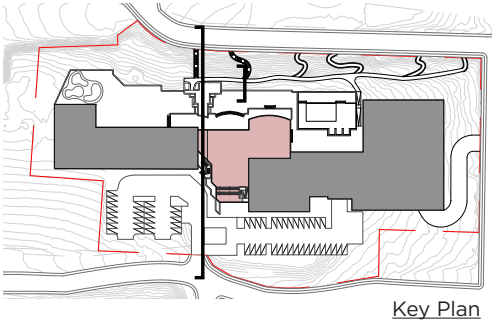
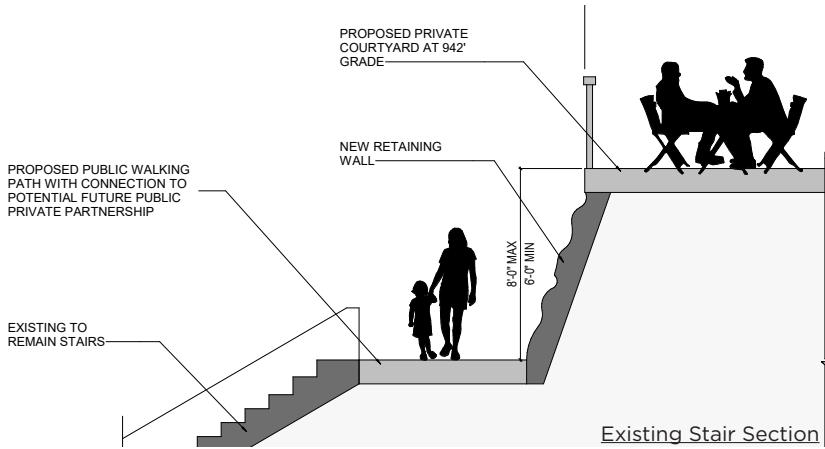
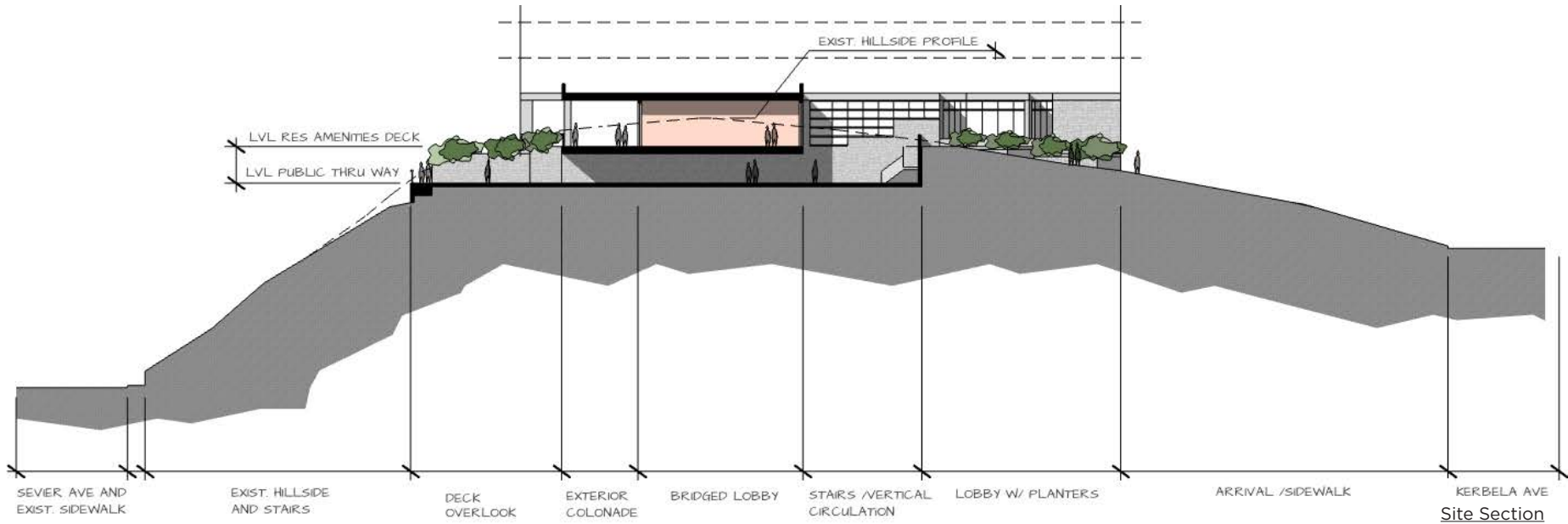




KERBELA DIAGRAM DISCUSSION

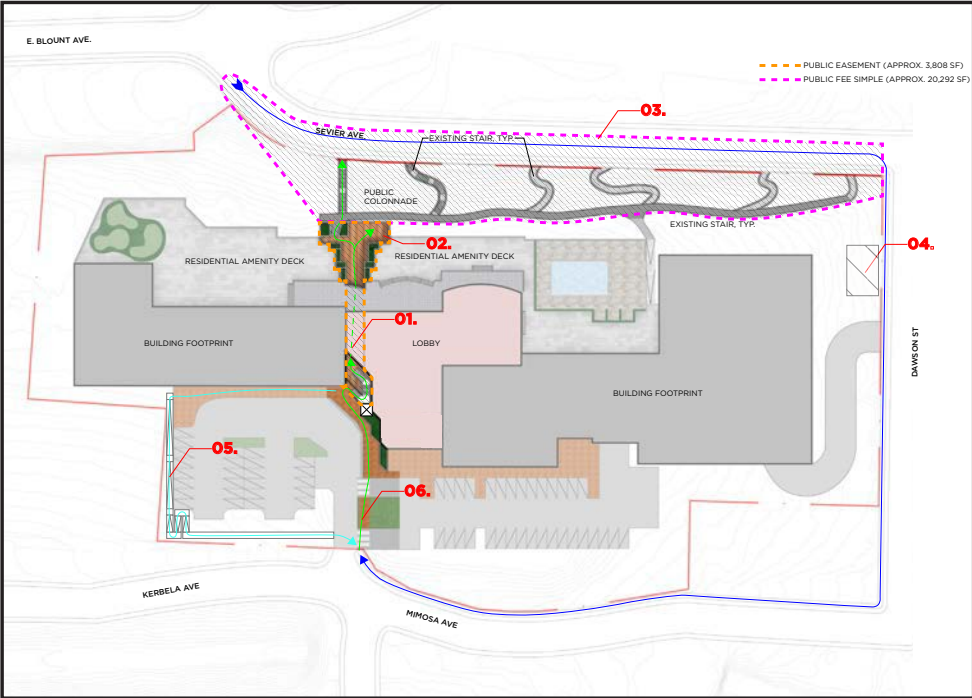


KERBELA DIAGRAM DISCUSSION



KERBELA DIAGRAM DISCUSSION

CURRENT SITE PLAN



- UPDATES KEY**
- 01. PUBLIC BREEZE WAY
 - 02. PUBLIC COLONNADE
 - 03. PUBLIC FEE SIMPLE AREA
 - 04. PUBLIC ART AREA DESIGNATION
 - 05. ACCESSIBLE PATH FROM MIMOSA/KERBELA TO BUILDING ENTRY AND PUBLIC BREEZEWAY
 - 06. PUBLIC PATH

PREVIOUS SITE PLAN



North Elevation - Glazing Diagram



Full drawing set as revised through 5/27/2026

315 Kerbela Ave
Knoxville, TN
April 27, 2026



**MICHAEL
GRAVES**

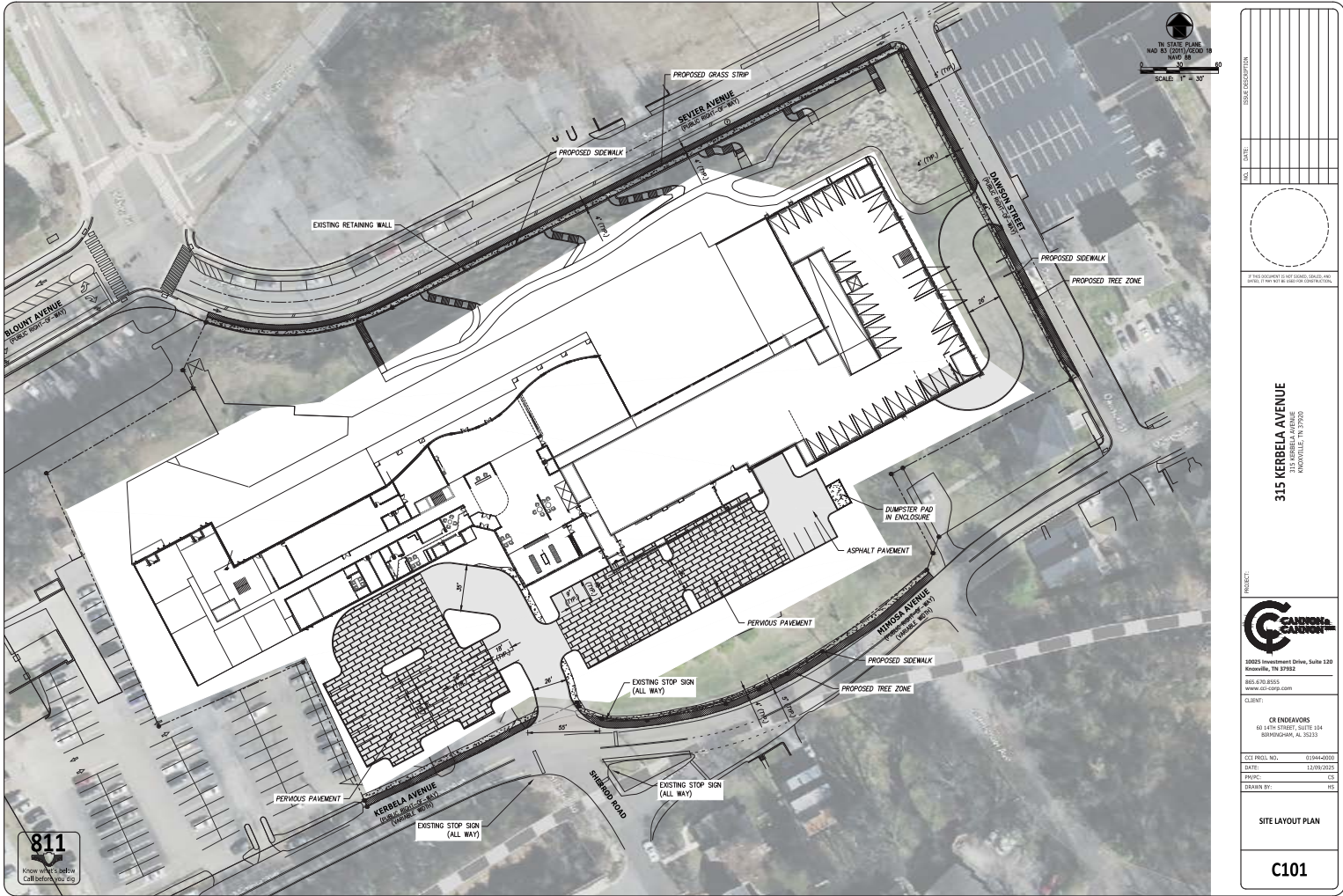


4-A-26-OB
Revised: 4/28/2026

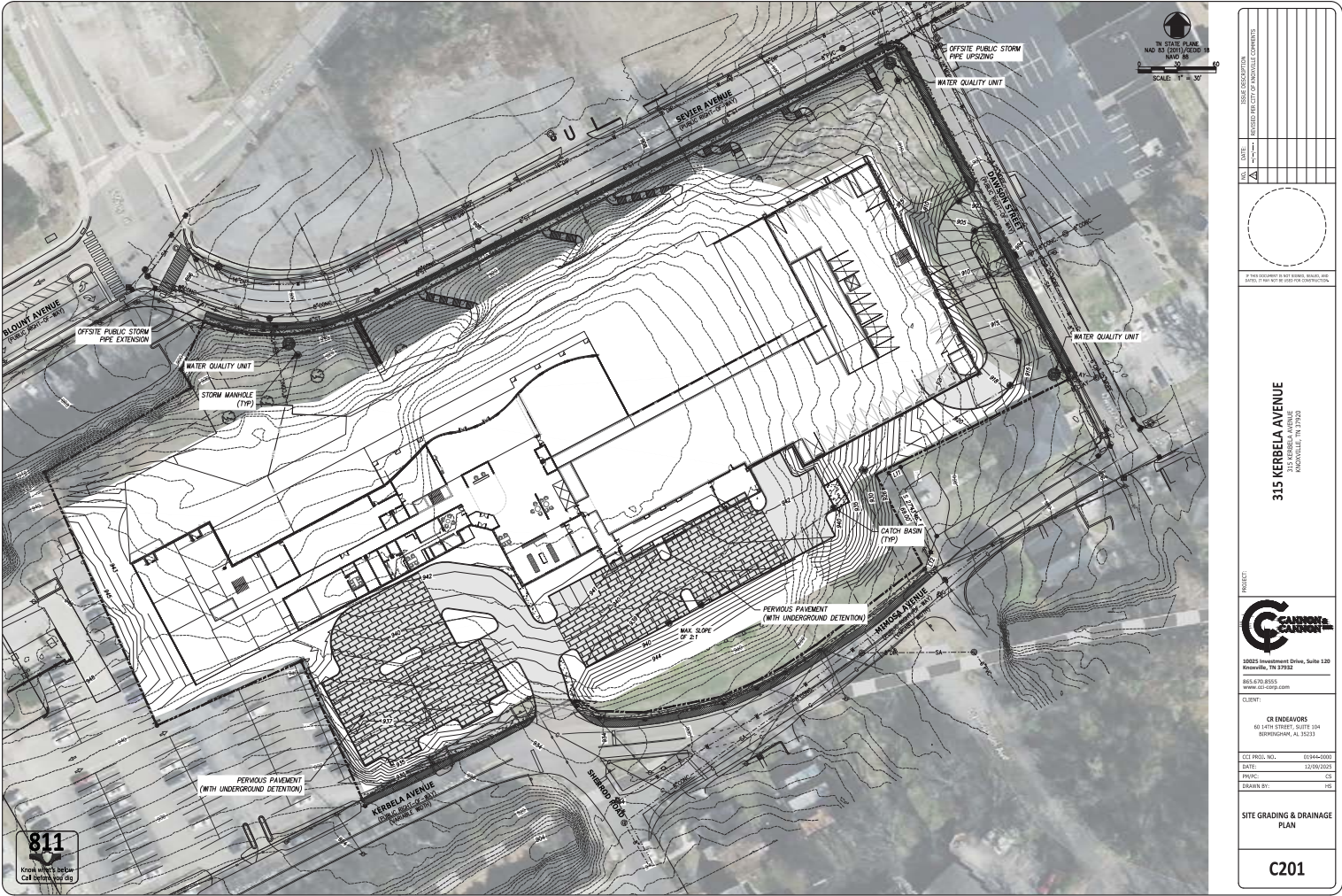
315 Kerbela Ave, Knoxville, TN
April 27, 2026
Page: 3



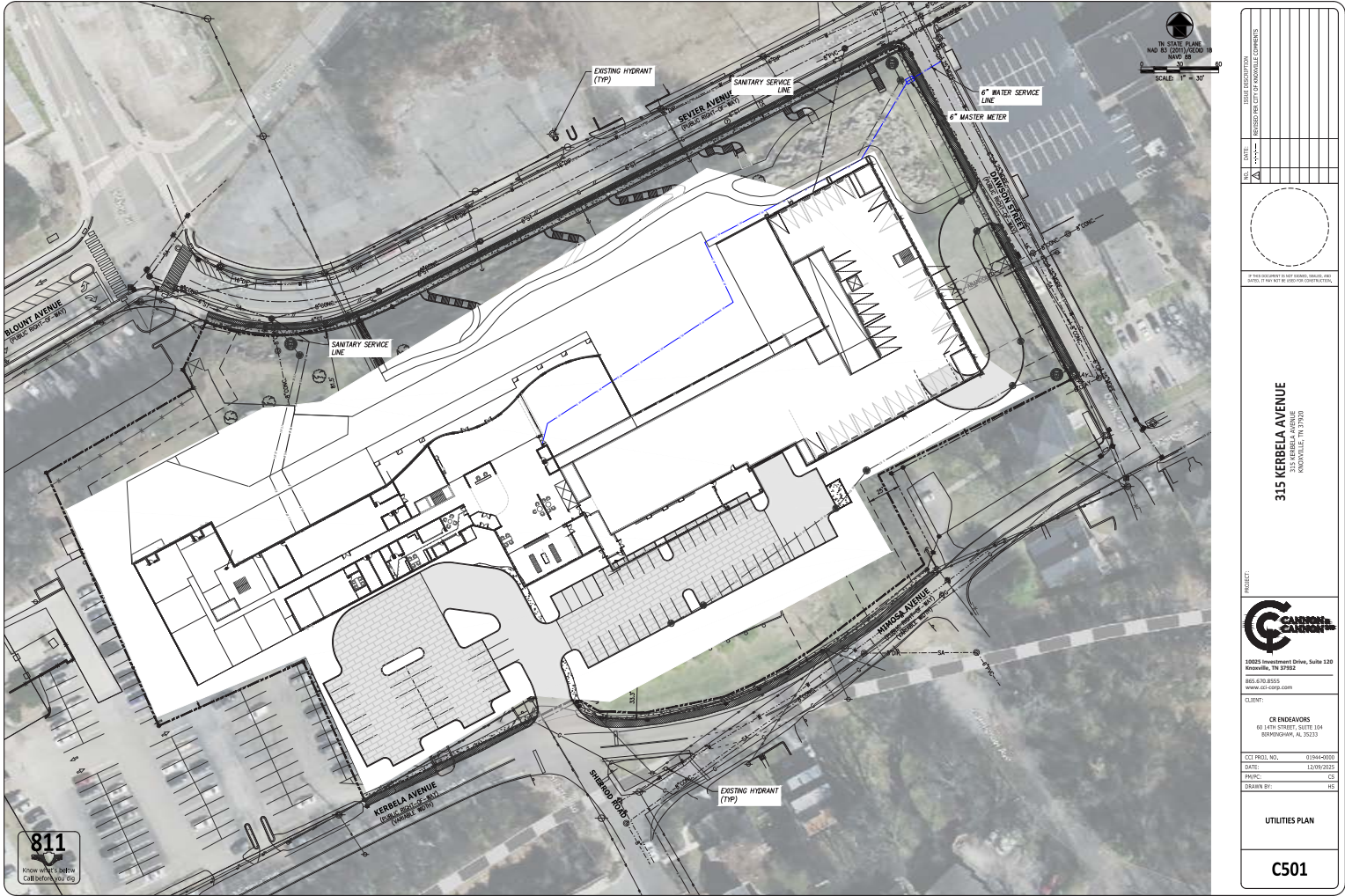
Civil Plan - Site Layout Plan



Civil Plan - Site Grading & Drainage Plan



Civil Plan - Utilities Plan



Transportation Diagram

Site Access

The site is located at the termination of the Gay St. Bridge and Sevier Ave. The South Waterfront Master Plan calls for multi-modal transportation options around the site including bike infrastructure, bus stops, and accessible pedestrian connections. The Mid River portion of the Master Plan prioritizes connectivity to this green way network and the sites centralized location allow for easy access to enjoyable active transportation options.



Site Topography

Existing Site Conditions

The site topography is generally steep and rocky. The perimeter of the site has slopes as steep as 40% with the worse conditions being along Sevier Ave. The Kerbela Shriners Temple and a large surface parking lot are currently occupying the buildable area centrally located on the site.



Site Topography: Reference Images

Existing Site Conditions

A large surface parking area encompasses the majority of the central portion of the site. This parking area slopes up to 20% towards Dawson St.



Image Key



1. Facing North along Kerbela Ave.



2. Facing South along Sevier Ave.



3. Facing West along Dawson St.



4. Facing Northeast from the peak of site

Site Topography: Reference Images

Existing Conditions at Sevier Ave

A series of existing concrete stairs are present that originally provided access to a row of demolished houses set back from the road to avoid the steepest part of the slope. These stairs terminate in an existing retaining wall that runs the length of the property line along Sevier Ave. While not currently code compliant, the stairs provide an interesting architectural feature that references the history of the site and will be incorporated into future site planning. The slope of Sevier Ave. is not currently ADA accessible. While it is appropriate to maintain pedestrian connections and bike infrastructure, the grade and existing site features present a unique hardship that impedes the ability to create a complete street with building frontage.

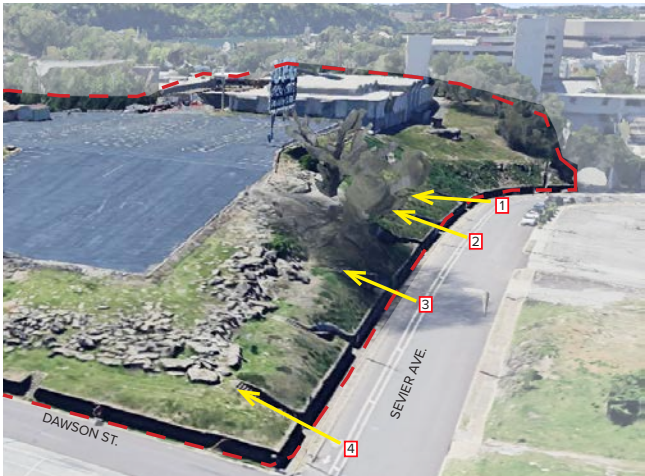


Image Key



1. Existing Concrete Stairs along Sevier Ave.



2. Existing Concrete Stairs along Sevier Ave.

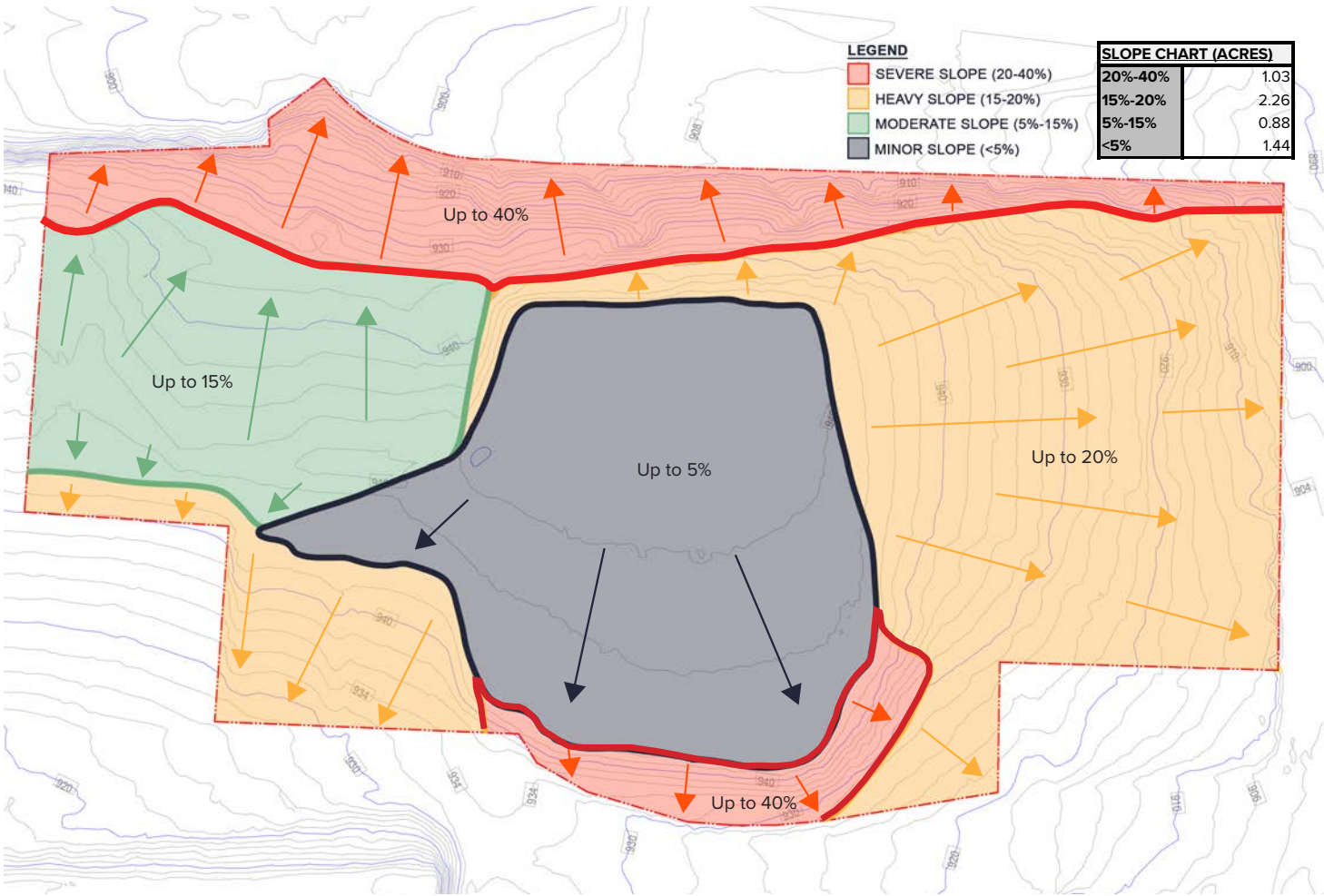


3. Existing Concrete Stairs along Sevier Ave.



4. Existing Rocky Outcropping along Sevier Ave.

SITE GRADING DIAGRAM



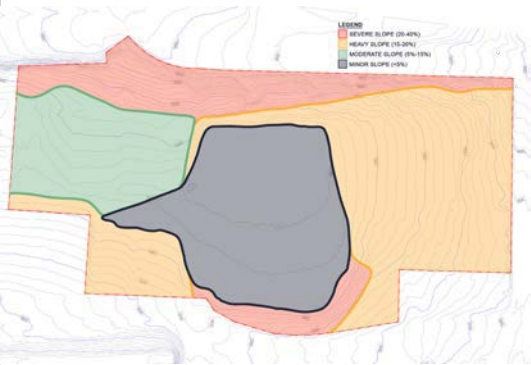
Site Topography



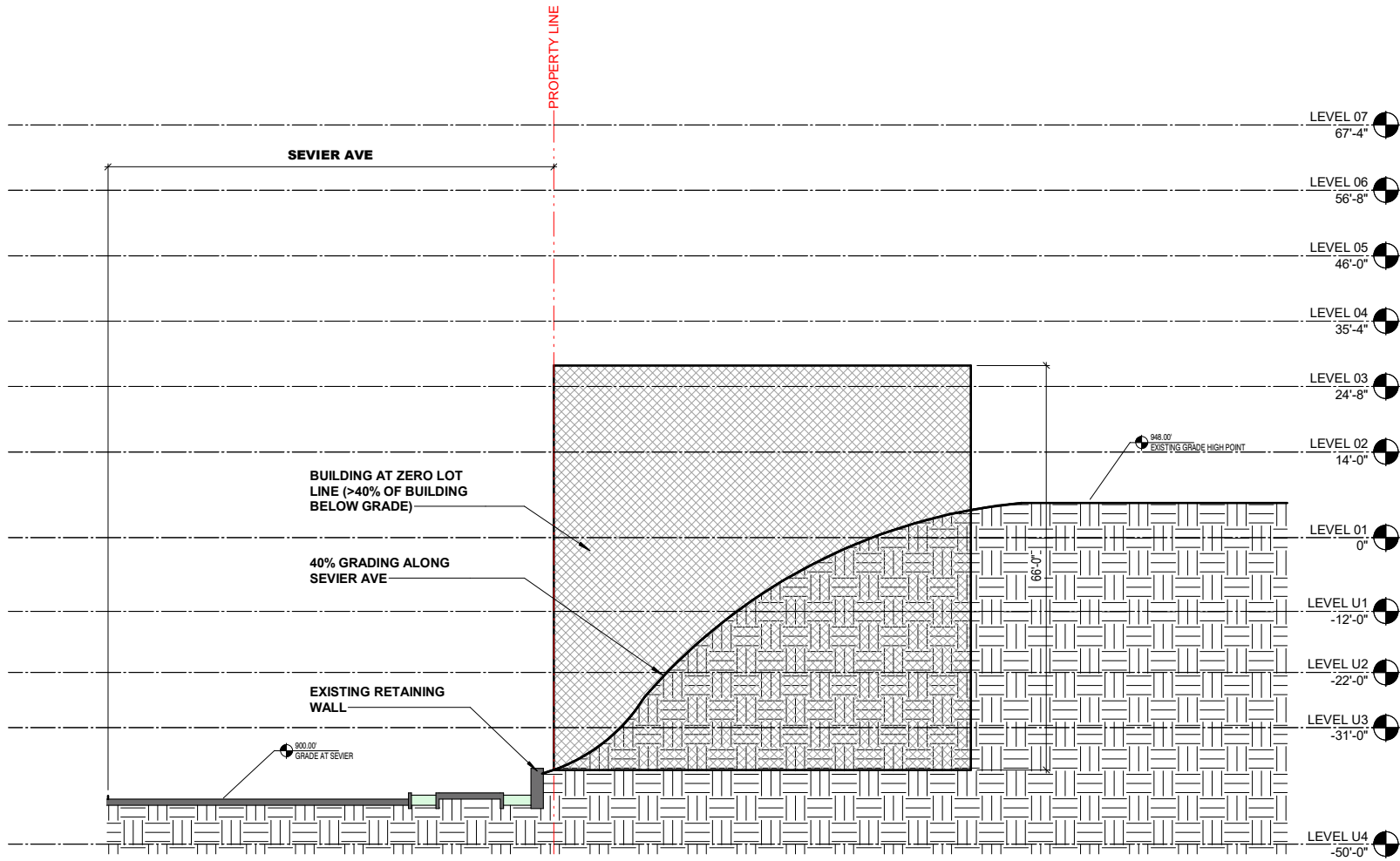
LEGEND

SEVERE SLOPE (20-40%)
HEAVY SLOPE (15-20%)
MODERATE SLOPE (5%-15%)
MINOR SLOPE (<5%)

SLOPE CHART (ACRES)	
20%-40%	1.03
15%-20%	2.26
5%-15%	0.88
<5%	1.44

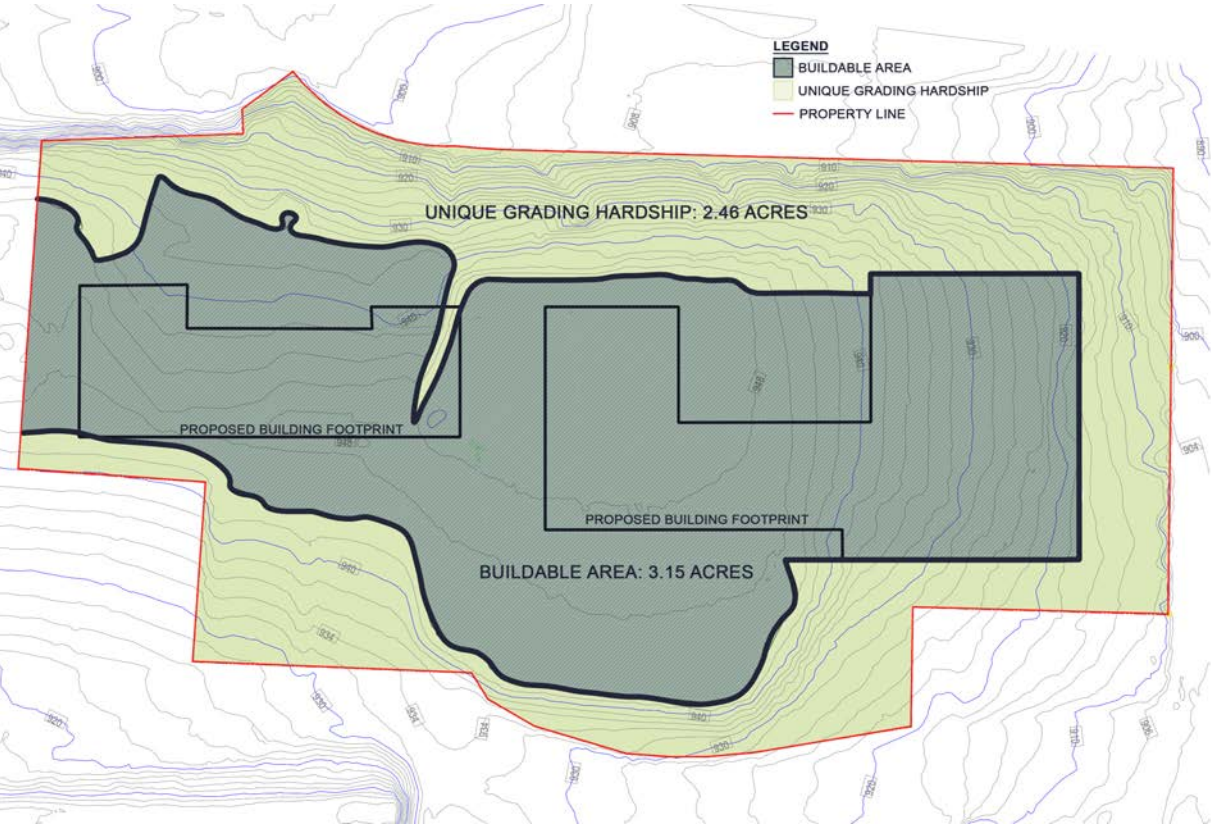


BUILDABLE AREA



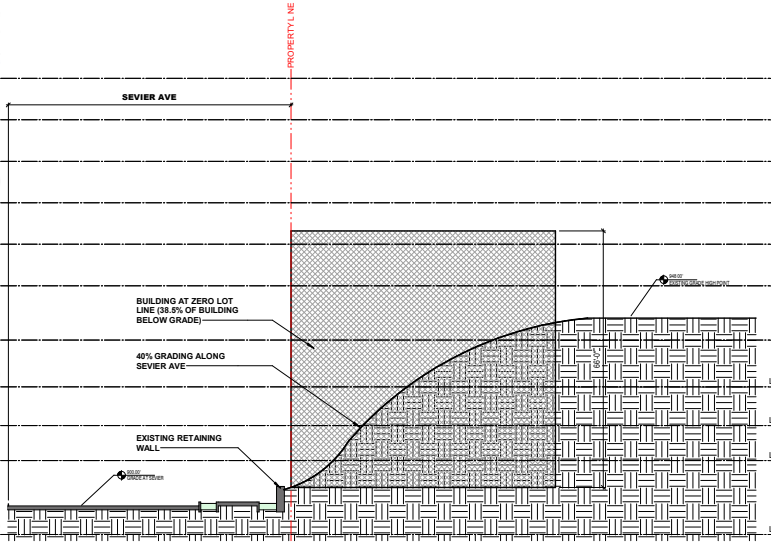
SECTION AT "ZERO LOT LINE"

BUILDABLE AREA



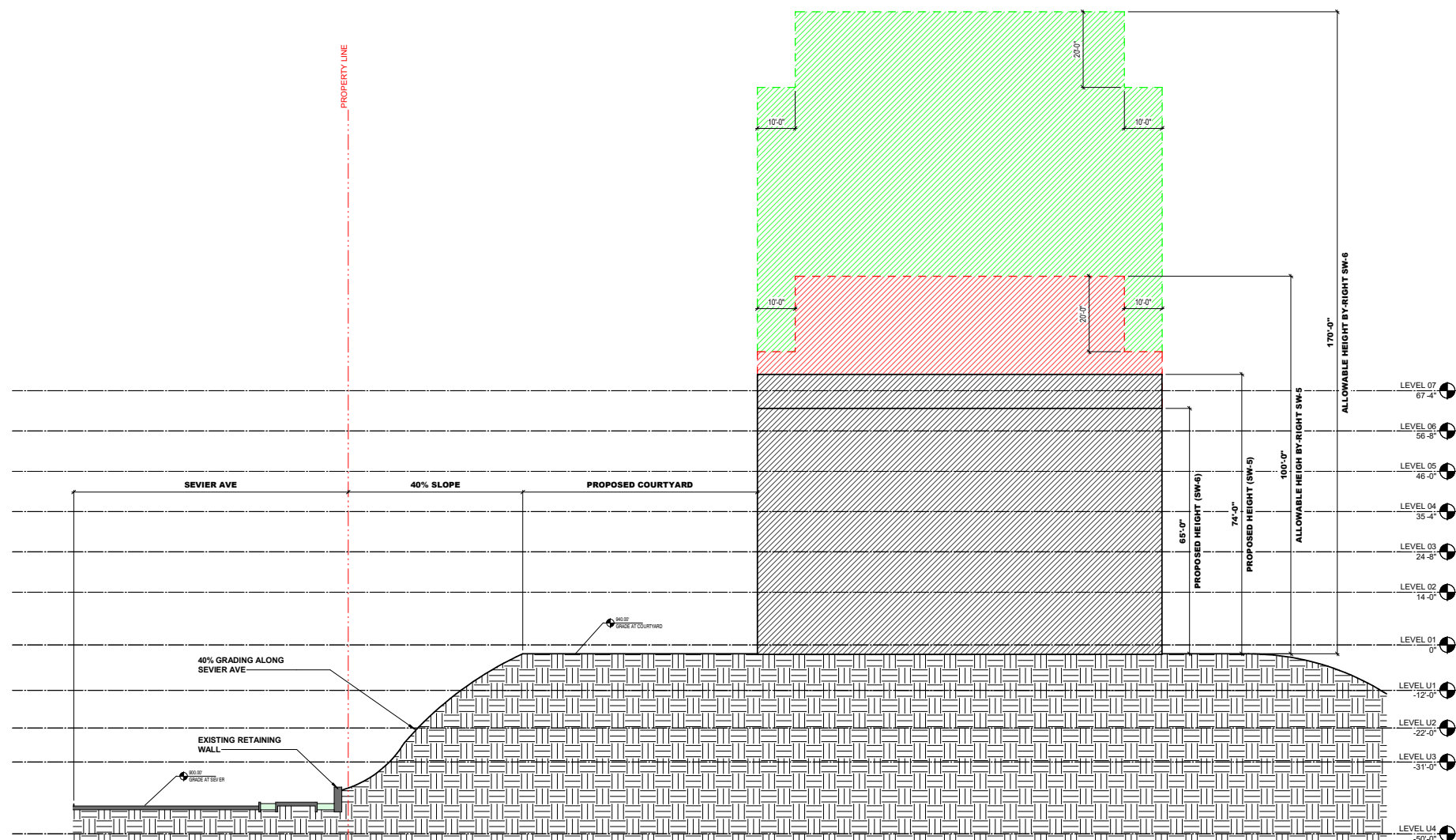
BUILDABLE AREA DIAGRAM

OVERALL LOT BUILDABLE AREA CHART (ACRES)			
	BUILDABLE AREA	UNIQUE GRADING HARDSHIP	TOTAL
SITE	3.15	2.46	5.61
RATIO	56.10%	43.90%	100%

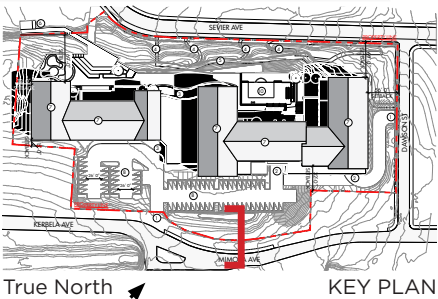
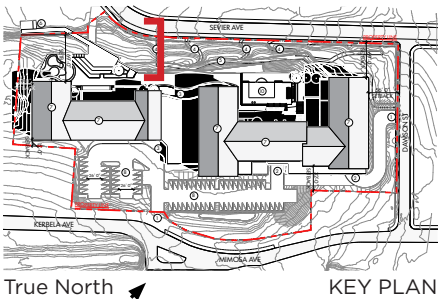
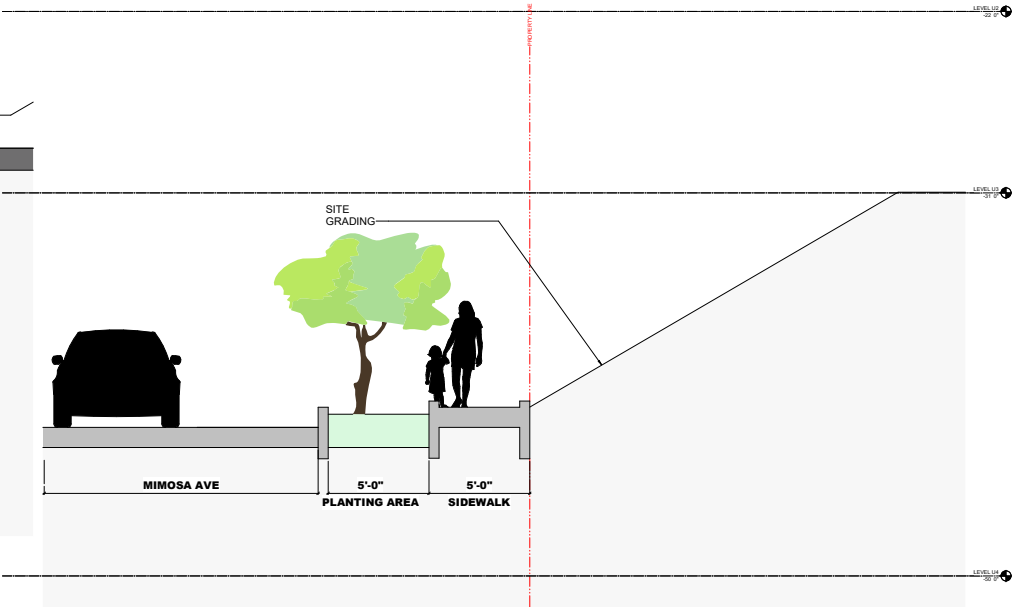
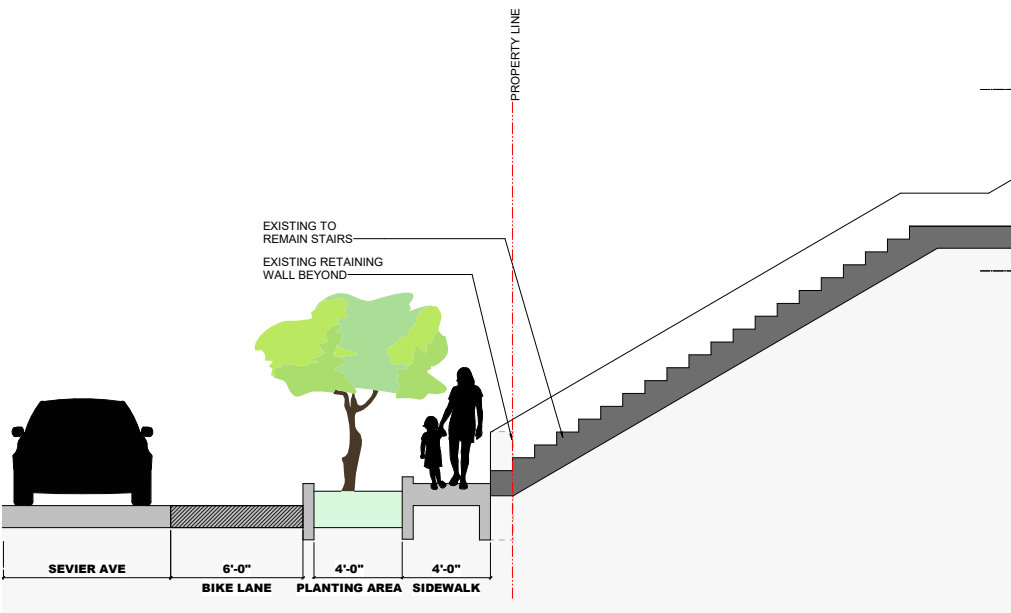


SECTION AT "ZERO LOT LINE"

BUILDABLE HEIGHT DIAGRAM



Streetscape - Sevier Ave.



Site Precedent | Connecting the Waterfront

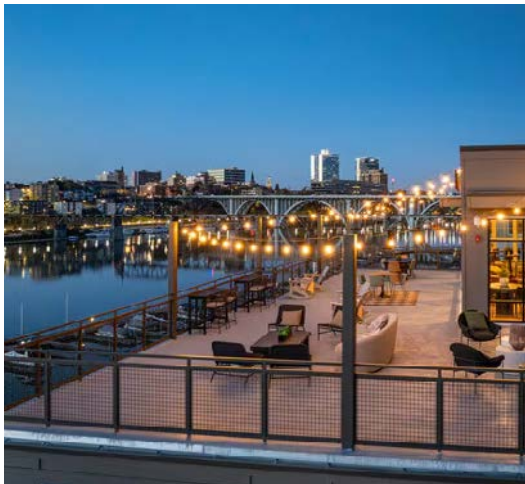
Site Information



Bowline Apartments | Champlin, MN



South Banks Apartments, Knoxville | Riverfront Connectivity



Livano Knoxville | South Waterfront District - Down River



Marina Square Waterfront Apartments | Seattle, WA

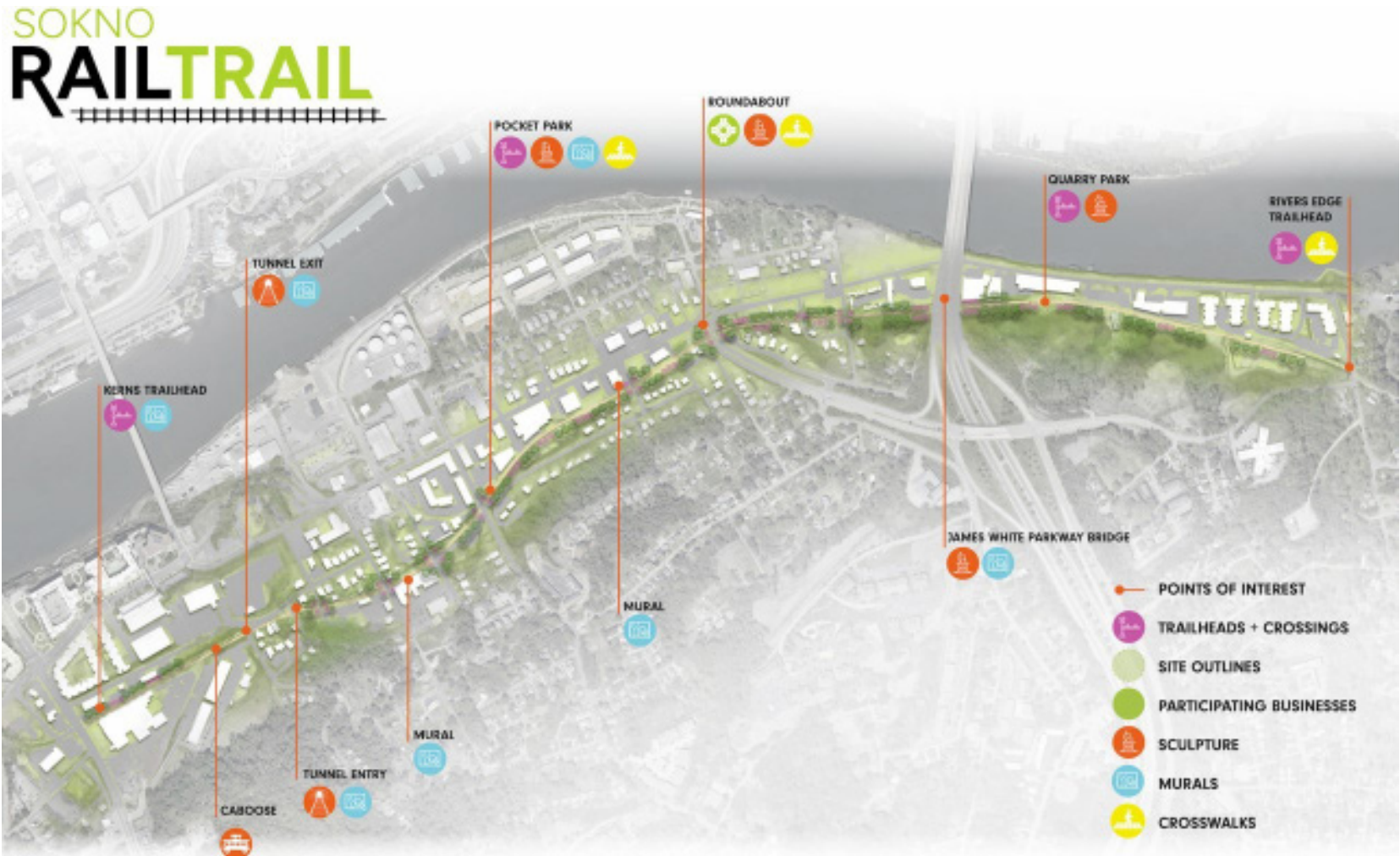


Apex Hudson Riverfront Apartments | Yonkers, NY

Site Precedent | SOKNO Rail Trail

Site Information

The SOKNO Rail Trail follows the Tennessee River, linking the South Knoxville neighborhoods with the city's expanding network of greenways and outdoor spaces. As it connects to the downtown via the Gay Street pedestrian bridge, the trail helps knit together both sides of the river with a continuous, walkable route for cyclists, runners, and daily commuters. With Knoxville continuing to grow, development around the trail is expected to encourage mixed-use spaces, outdoor recreation, and shared public areas that strengthen community camaraderie and make the riverfront an even more vibrant gathering place.



Livano Knoxville | South Waterfront District - Down River

Architectural Narrative



Project Parameters:

Overall Building GSF = 366,901 SF
Number of Units – 217-223
Indoor Amenity - 18,000 - 25,000 SF
Outdoor Courtyard Amenity- 47,036 SF

Number of Parking Spaces –
228-235 Total
69 Surface Spaces
159-163 Structured Garage Spaces

Project Overview

315 Kerbela is a 5.7-acre, split-zoned (SW-5 / SW-6) site in Knoxville's Southwest Waterfront District. The proposal is an active-adult apartment community of approximately 217 units composed of two buildings connected at ground level by a shared lobby and resident gathering space. The design transforms an unimproved lot into a walkable, mixed-use edge that advances the district vision and form-based code objectives.

Response to Context and Vision

The project implements the Southwest Waterfront district framework by activating the street edge, supporting appropriate density, and preserving adjacent waterfront stairs and viewpoints along Sevier Ave. Repairs and preservation of existing stairs will allow public to walk and use the stairs for views along the river walk. The development reinforces the district's goal of creating a vibrant, pedestrian-oriented urban neighborhood that balances new residential growth with civic benefit and historic character.

Site and Urban Design

Two distinct but related volumes (East wing — six stories; West wing — five stories) bookend a landscaped central courtyard. The massing steps down toward the west to reduce perceived scale from the street. The central courtyard and adjacent hardscape form flexible gathering space for residents, drawing activity into the site and reinforcing a human-scaled block pattern. New sidewalks along Mimosa and Kerbela Ave will be added to improve walkability with a landscape buffer. Along Sevier Ave- improvements and landscape will be added to the existing sidewalks.

Form-Based Code and Material (SW-5 / SW-6 Compliance)

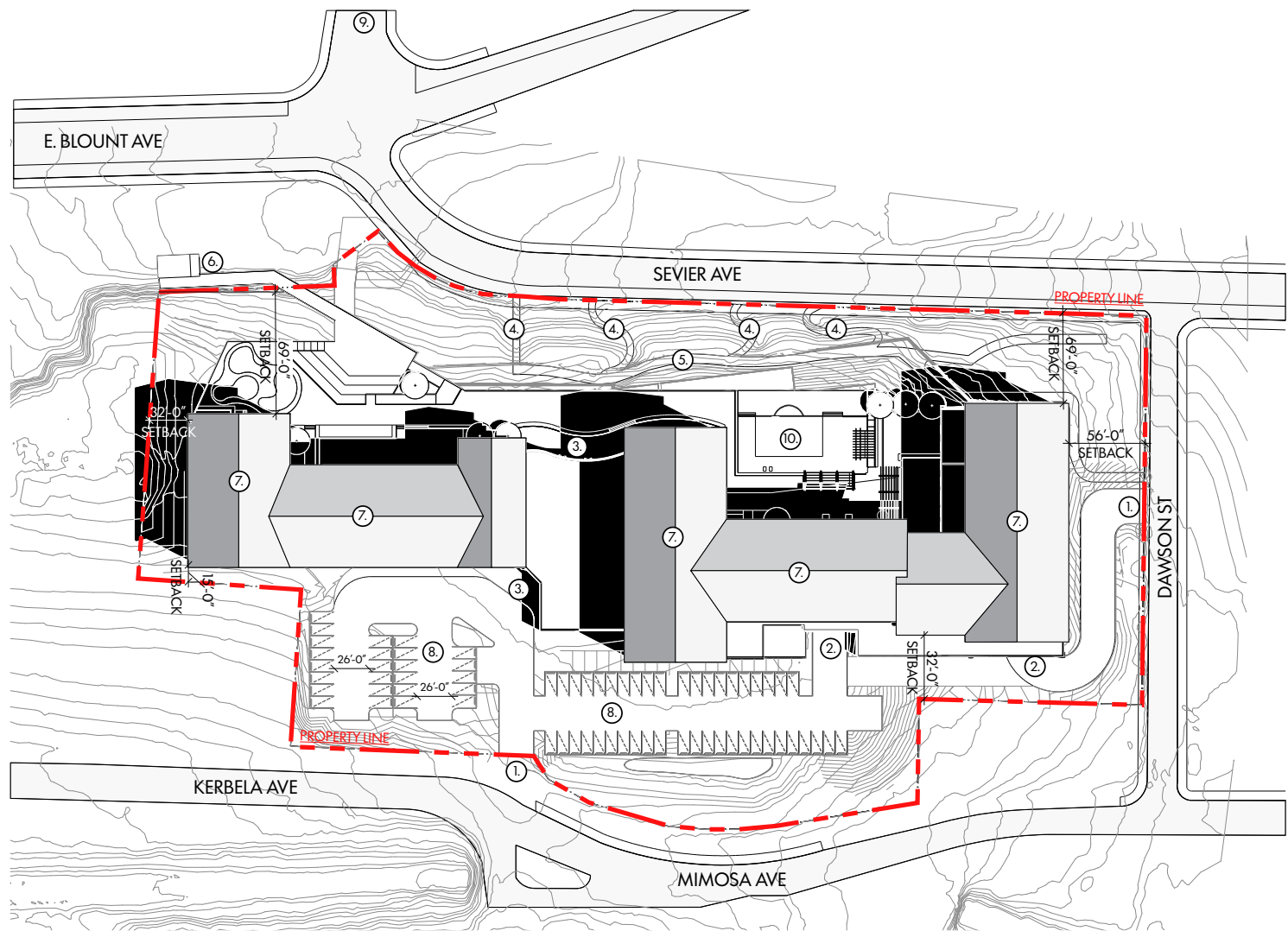
Materials follow the SW form-based code emphasis on durable, high-quality, street-oriented facades: masonry (primary), natural stone and stone-treated concrete accents, and expansive glazing at ground level for visual permeability and activation. Secondary materials include carefully detailed board-and-batten panels and select siding accents to articulate façade bays, create rhythm, and reflect Knoxville's heritage. Warm, finished wood tones are used at the primary connection and lobby to provide a pedestrian-scaled, inviting material expression. Large window openings and private balconies are composed of activating façades while maintaining modulation and human scale. Articulated banding, recessed entries, and vertical/fenestration breaks reduce perceived mass and align with SW-5/6 façade requirements.

Sustainability, Mobility, and Public Benefit

The design prioritizes walkability and multimodal access: new sidewalks, improved street lighting, on-site bike parking for residents and storage, and connections to nearby transit and waterfront trails. Stormwater management strategies and durable low-maintenance materials reduce long-term lifecycle costs and improve site resiliency. The project delivers public benefits through site improvements, increased local housing supply per the Southwest Framework vision (active adult market), and enhanced property tax revenue to support municipal services.



Site Plan - Architectural (New Design)



- KEY
- 1. Vehicular Entry
 - 2. Garage Entry
 - 3. Bulding Entry
 - 4. Existing to Remain Stairs
 - 5. Public Walking Path
 - 6. Public Elevator
 - 7. HVAC Well
 - 8. Surface Parking
 - 9. Gay Street Bridge Beyond
 - 10. Swimming Pool

SCALE: 1"=80'
True North

Rendered Site Plan (New Design)



KEY

1. Main Entrance
2. Vehicular Entry
3. Garage Entry
4. Building Entry
5. Surface Parking
6. Swimming Pool

SCALE: 1"=80'

True North 

MICHAEL GRAVES

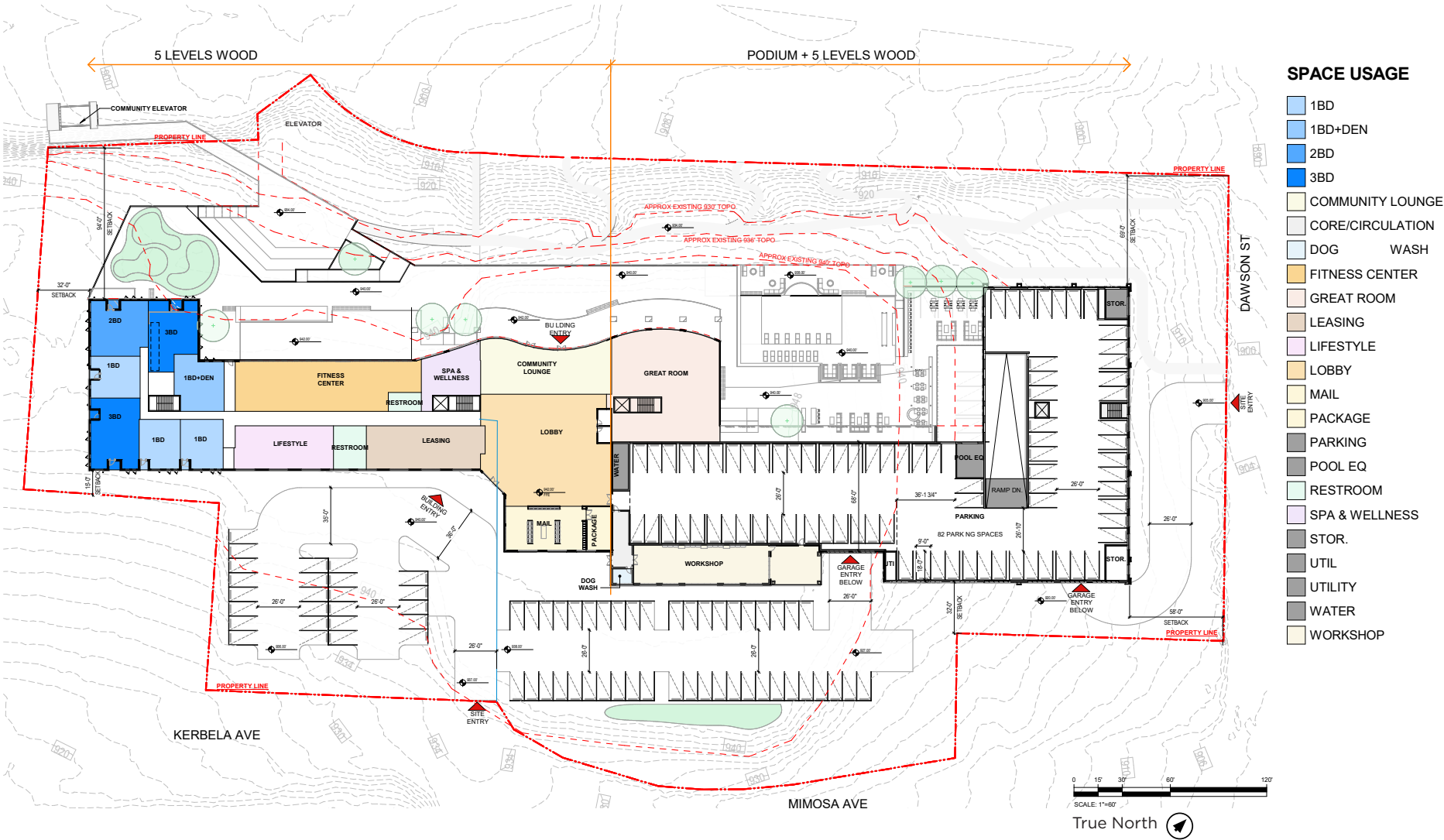


CR ENDEAVORS

4-A-26-OB
Revised: 5/27/2026

315 Kerbela Ave, Knoxville, TN
May 26, 2026
Page: 34

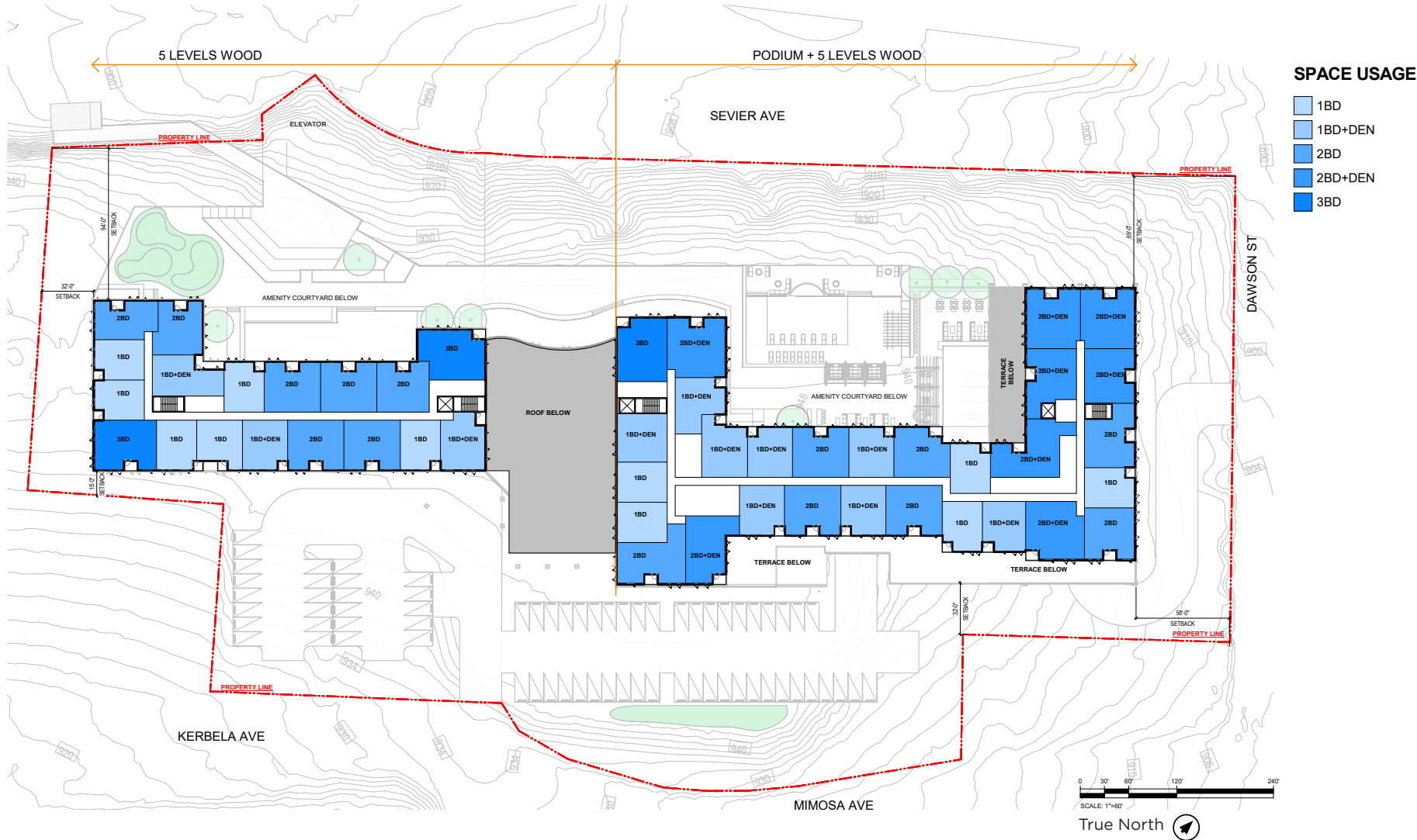
LEVEL 01



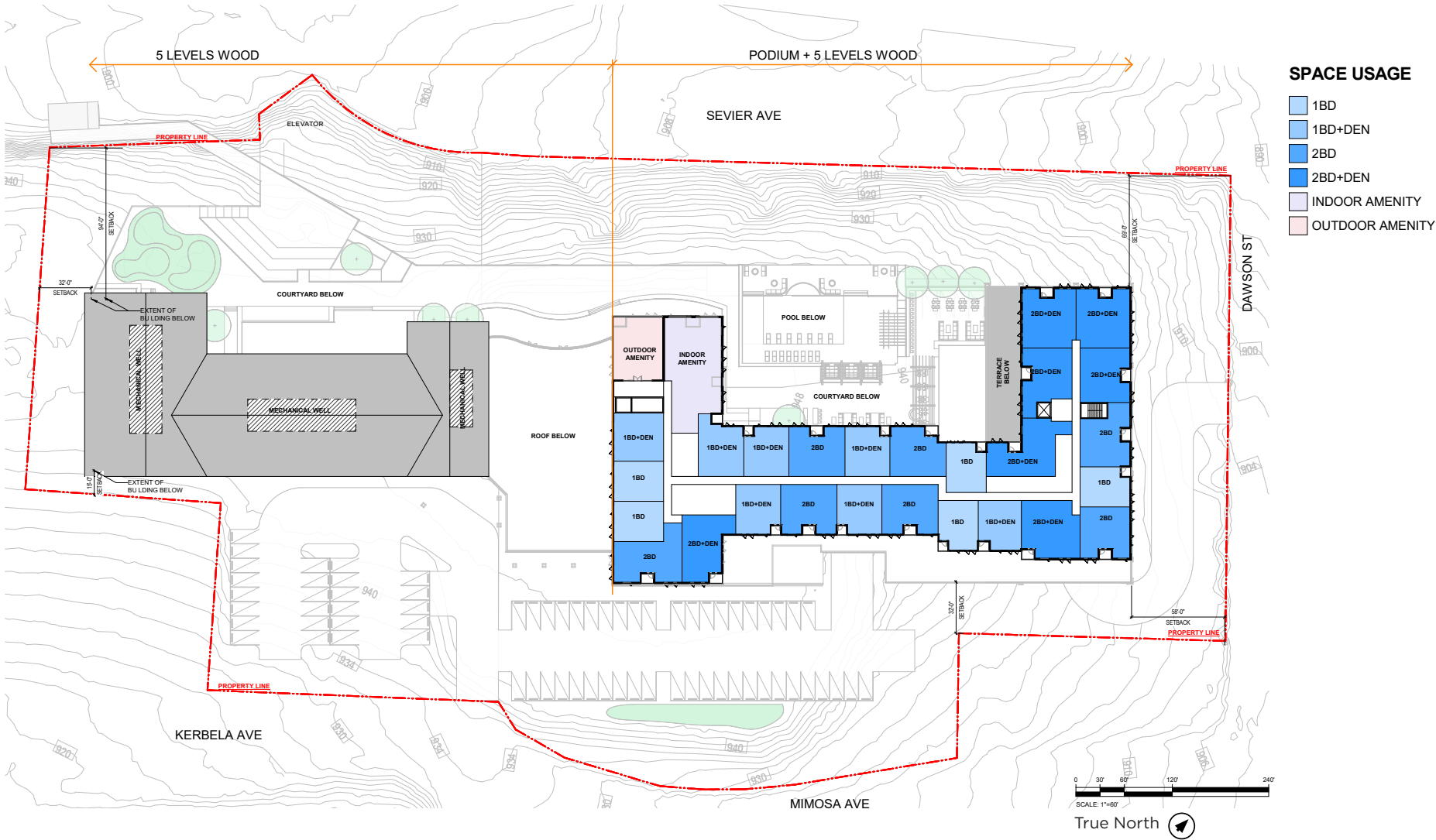
LEVEL 02



TYPICAL (LEVEL 03-05)



LEVEL 06



Perspective 01



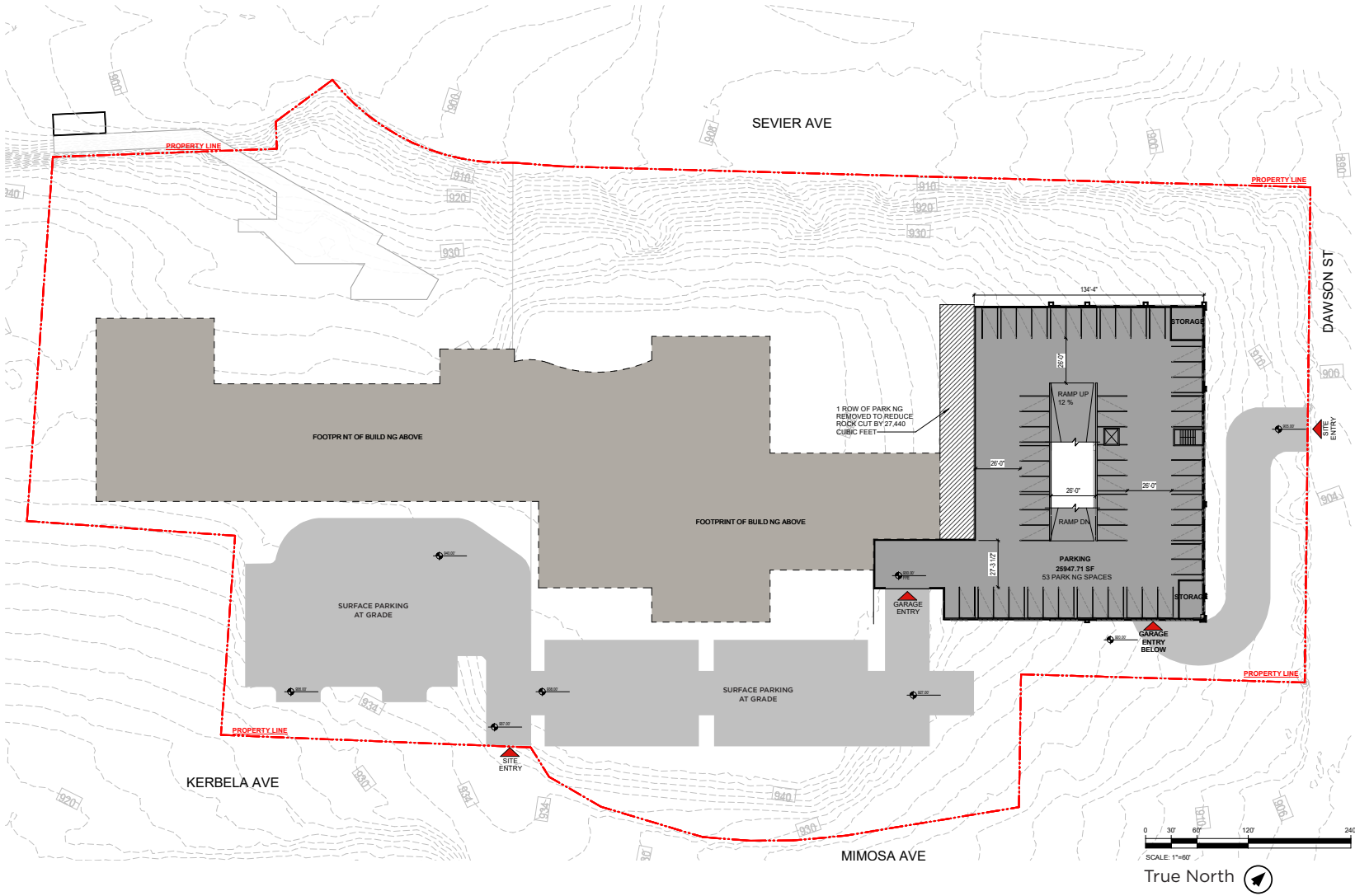
Perspective 02



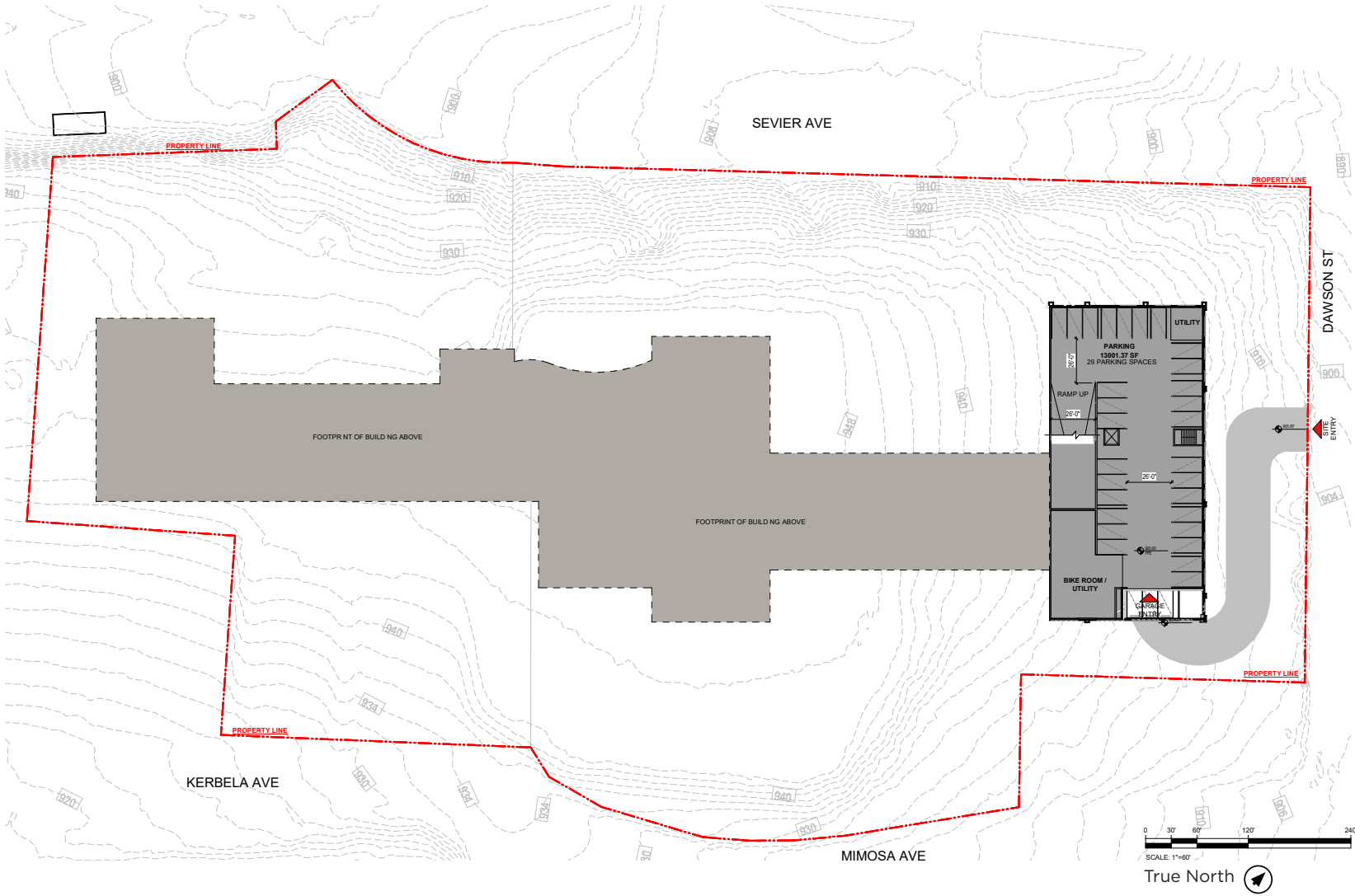
Perspective 03



GARAGE LEVEL 01

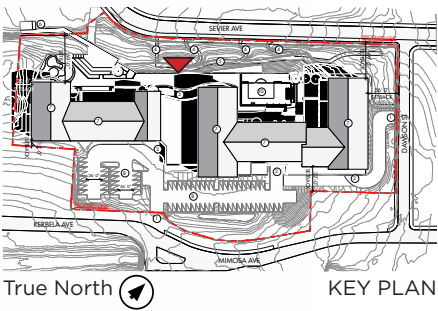


GARAGE LEVEL 02 (STREET LEVEL)

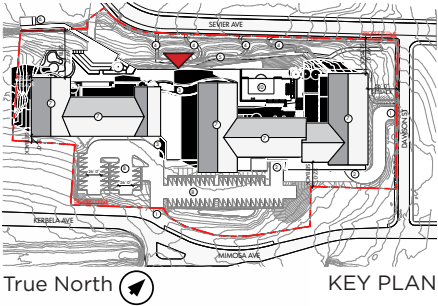


North Elevation

Ground Floor Glazing Calculation:
Wall Area: 5,714 SF*
Glazing Area: 4100 SF*
Percentage: 71.7%
*Glazing percentages do not include garage area



SCALE: 1"=60' KEY PLAN

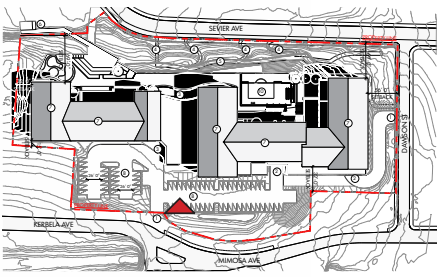


SCALE: 1"=60' KEY PLAN

South Elevation



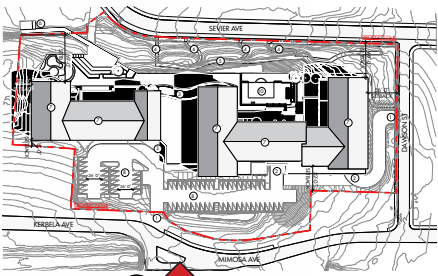
SCALE: 1"=60'



KEY PLAN



SCALE: 1"=60'



KEY PLAN

**MICHAEL
GRAVES**



CR ENDEAVORS

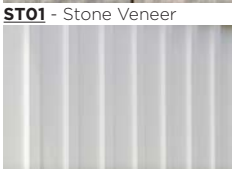
4-A-26-OB
Revised: 4/28/2026

315 Kerbela Ave, Knoxville, TN
April 27, 2026
Page: 43

Enlarged Elevation - Sevier Ave



MATERIAL KEY:
FCP: Fiber Cement Panel
ST: Stone Veneer
BR: Brick Masonry

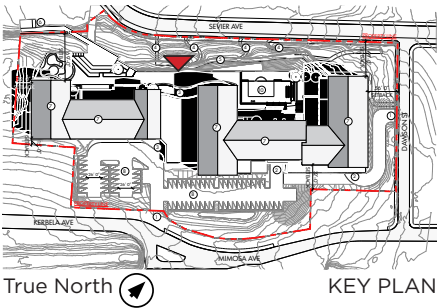


ST01 - Stone Veneer



FCP01 - White Board and Batten Fiber Cement

FCP02 - Wood Textured Fiber Cement Siding



Perspective



Enlarged Elevation - Sevier Ave.



MATERIAL KEY:
FCP: Fiber Cement Panel
ST: Stone Veneer
BR: Brick Masonry



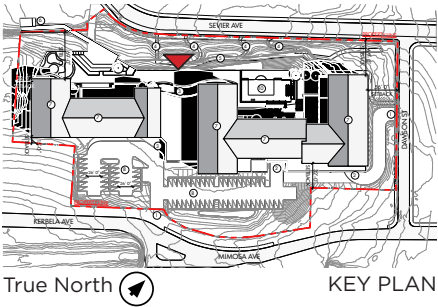
FCP01 - White Board and Batten Fiber Cement



FCP02 - Wood Textured Fiber Cement Siding



BR01 - Brick Masonry, Brown and Grey Blend



Perspective



Perspective





4-A-26-OB
Revised: 5/27/2026



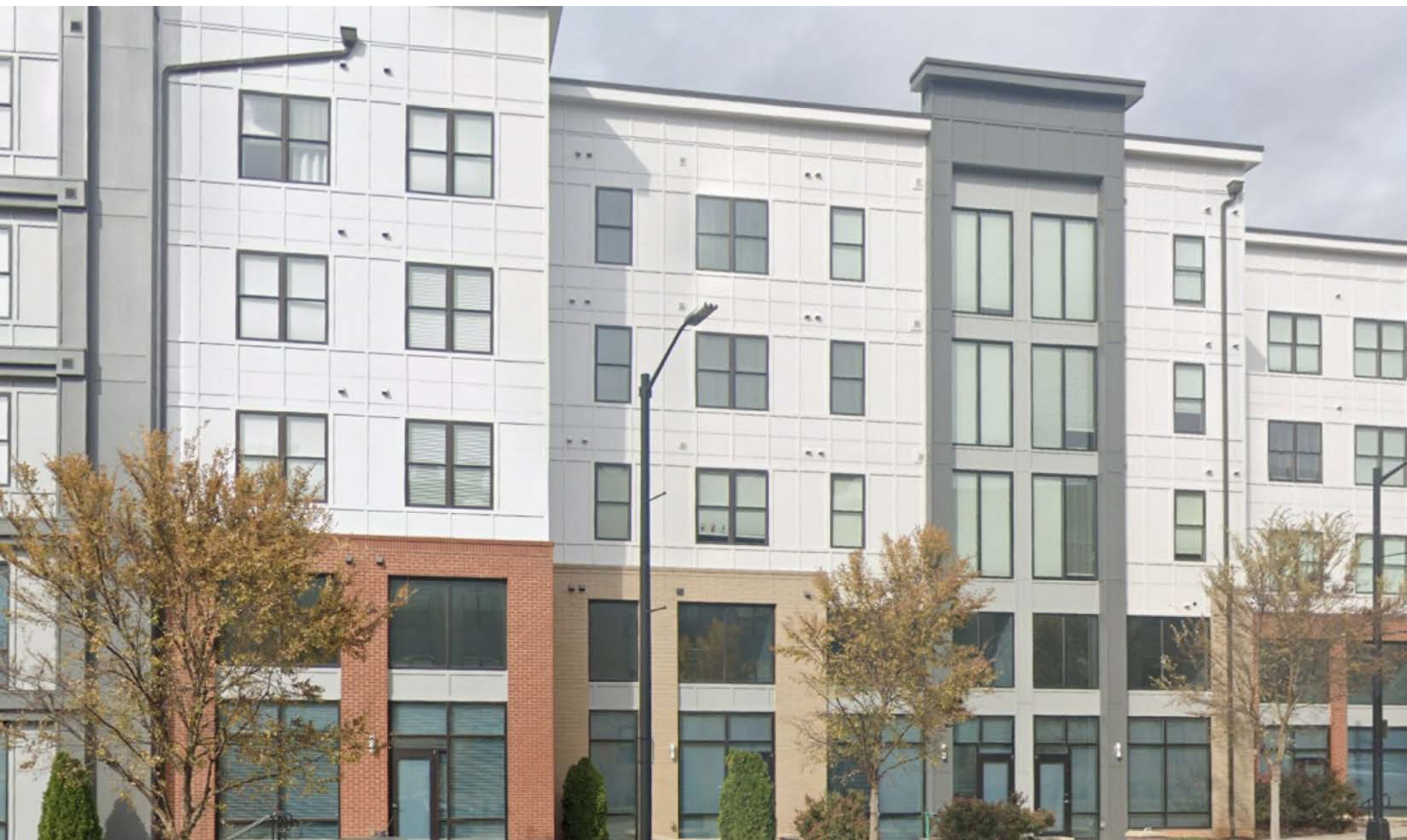
4-A-26-OB
Revised: 5/27/2026



4-A-26-OB
Revised: 5/27/2026



4-A-26-OB
Revised: 5/27/2026



4-A-26-OB
Revised: 5/27/2026

Public Notice and Community Engagement

Planning strives to provide community members with information about upcoming cases in a variety of ways. In addition to posting public notice signs, our agency encourages applicants to provide information and offer opportunities for dialogue related to their upcoming case(s). The contact information you provide in your application may be used for that purpose. We require applicants to acknowledge their role in this process.

Sign Posting and Removal

The Administrative Rules and Procedures of the Knoxville-Knox County Planning Commission require a sign to be posted on the property for each application subject to consideration by the Planning Commission.

Planning staff will post the required sign. If a replacement sign(s) is needed, the applicant is responsible for picking up the new sign(s) from Planning and will be charged \$10 for each replacement.

Location and Visibility

The sign must be posted on the nearest adjacent/frontage street and in a location clearly visible to vehicles traveling in either direction. If the property has more than one street frontage, the sign should be placed along the street that carries more traffic. Planning staff may recommend a preferred location for the sign to be posted at the time of application.

Timing

The sign(s) must be posted not less than 12 days prior to the scheduled Planning Commission public hearing and must remain in place until the day after the meeting. In the case of a postponement, the sign can either remain in place or be removed and reposted not less than 12 days prior to the next Planning Commission meeting. The applicant is responsible for removing the sign after the application has been acted upon by the Planning Commission.

Acknowledgement

By signing below, you acknowledge that public notice signs must be posted and visible on the property consistent with the guidelines above and between the dates listed below.

3.28.26

Date to be Posted

4.10.26

Date to be Removed

Have you engaged the surrounding property owners to discuss your request?

☒ Yes ☐ No

☐ No, but I plan to prior to the Planning Commission meeting

Applicant Signature



RYAN ROBERTSON
Applicant Name

2.20.26
Date