

Delivered orally to the City Council Workshop on April 4, 2019.

A second workshop or roundtable discussion was held on the afternoon of Thursday, February 28th to look specifically at the Design Standards, Material Restrictions, and the Design Review Process as outlined in the current draft of the new zoning ordinance.

We began the afternoon with a recap from Amy Brooks of the Project Vision: To promote investment in Knoxville. Protecting what makes our city great. To create a zoning code that is easier to use and administer - one that is clear, predictable, and transparent.

Given these guiding principles and goals of the recode process, architects and designers divided into teams to tackle specific districts in the city.

The general consensus from the charrette and workshop was overall positive. It promotes a more progressive approach to the growth of the city and tries to be sensitive of existing conditions. We believe that the overall usability of the proposed code is improved.

That said, out of the evaluation came a number of recommendations for further improvements, refinements, and clarifications. Here are the highlights:

1. Material Restrictions is a challenging topic. One participant said – **‘Any good material can be used poorly, and any restricted material could be used well’**. We would recommend further refinement and clarification. For instance:
 - a. When there are material restrictions, we recommend more specificity as to the intention of the restriction, perhaps including specific examples of poor usage.
 - b. We recommend more specificity to material definitions. For example, “plastic” is a fairly broad term and could be applied to anything from petroleum-based products to concrete, solid surface materials, or any number of polymer type of materials.
2. Design Standards
 - a. Elements in the new code like the design standards application chart improve clarity and usability. (Figure 1)
 - b. We recommend coordination of design standard language with other adopted city codes. For instance, references to percentage of glazing on a façade should be coordinated (or perhaps just reference) sections in the Energy Code. There are instances where material restrictions can be addressed by allowable materials in the IBC Fire district Codes, and height limitations that can be governed by the building code. Consistency between codes can further make the zoning ordinance easier to understand and administer.
 - c. Like the Material Restriction section, there are a number of places where the code can be clarified with more specific language – words like ‘transparency’ or ‘repetition’ can be confusing or mean multiple things.
 - d. We recommend increased clarity of intent of design standards. As we reviewed the document there were a number of instances that were difficult to evaluate –

such as “no blank walls longer than 30’0” - without this clear understanding or context. I will come back to this point in a minute.

3. Graphic Illustrations

- a. In many ways, the Design Standards diagrams do a nice job in making clear the meaning of the design standard. (Figure 2)
- b. One area of concern is the degree to which these illustrations might start to dictate a ‘style’. Some cities like Charleston or Santa Barbara have very consistent architectural styles throughout. However, Knoxville likes architectural diversity - quality, but diversity. We would recommend adapting any graphics to be less leading towards what may be assumed to be a ‘preferred style’

Governing Design Principles. As I mentioned earlier, there were several instances during the evaluation where the lack of intent made interpretation or evaluation difficult. We recommend adding a section to the code that outlines the code’s guiding principles. Design Standards – as they currently exist in the code – outline **what** to do. They do not describe the purpose or intent of the code. The **‘why’**. We believe that this section of “Guiding Design Principles’ should be a preface to all of the design standards language in the document.

What I am illustrating here is an example of such design principles. These were recently developed for the city of New York, specifically for Quality Affordable housing. But these principles are in many ways universally agreed upon as good design strategies. Design ‘101’ if you will. (Figures 3-5)

It is assumed that many of the design standards in the proposed code are attempting to control for these types of principles. If that is the case, we think that these governing Design Principles should be made explicit.

It is important to remember that the Design Standards and Material Restrictions along with the review process were developed for a reason. In essence it is to create a floor for a minimally acceptable design standard, specifically for important corridors in the city and create a review process that is manageable, transparent, consistent, and predictable. All of those are good things. However, what often happens with prescriptive design standards is that you not only create a floor for acceptable design, but you can also create a ceiling that prevents what could be outstanding design. That is often the challenge with prescriptive design standards - to safeguard the design of the city against some agreed upon idea of bad design without limiting greatness. Given the Project Vision and Goals, we believe that promoting greatness in the city is the intent, not limiting it. (Figure 6)

The proposed review process outlined in the draft code would have projects subjected to design standards to be reviewed by the city codes departments. For the sake of consistency and efficiency, this process would be very prescriptive. It is effectively a series of check boxes intended to be quantifiable and measurable.

We recognize the need of this 'fast track' process. With good clear standards there are many projects for which this works well. However, we would recommend the option of an alternative approval process. (Figure 7)

Figure 7 illustrates a dual path approach with what is referred to as a Prescriptive Path and a Performance Path. The Prescriptive Path is the current proposal for all projects subject to design standards.

The proposed alternative Performance Path would give project teams the option of avoiding design standards and instead design to meet the Design Principles. Those projects would be reviewed by the Planning Staff. With qualified staff, we believe that the Planning department could review and approve most project within the department. For projects that may require further review we would propose that they be reviewed by a design review board. When the DDRB was established, downtown was in a more delicate state. Having the board in place has helped ensure higher quality growth and development to our city center. In the years since its establishment. We are now at a point in the city's development where it is the major corridors that are experiencing increased activity. Allowing the existing design review board to expand its purview to include these corridors when the project needs review beyond Planning is one way to accomplish this.

AIA ETN supports the major content and intent of the proposed zoning ordinance developed through the ReCode process. As indicated here, there are portions of the code that we believe need further study and evaluation. Therefore, we recommend the continuation of the Stakeholders Advisory Committee for a period of time no less than two years following approval of the code.