

MACKEY BUTTS & WHALEN LLP

ATTORNEYS AT LAW

August 19, 2025

VIA EMAIL

Planning and Zoning Commission
Town of Salisbury, Connecticut
PO Box 548
27 Main Street
Salisbury, CT 06068

RE: Responses to Questions and Comments from Special Hearing
Application #2025-0287, Wake Robin Inn Redevelopment

We represent Aradev LLC. On their behalf, Aradev, LLC, offers the following responses to the questions and comments to the Special Hearing on August 14, 2025.

Questions & Comments from Commission Members:

C1: How many people does the motel accommodate? Please show a breakdown of occupancy: Are the cottages a reduction compared to the existing motel? "If the motel held that many people, then it's like a motel broke up into pieces and scattered about."

R1: The current motel structure has a building footprint of 7,100 sf containing 15 guest rooms with an occupancy of 38 total guests. The room count includes 11 queen/king and 4 double double room types which equates to a maximum occupancy (using the same occupancy as per the new Inn) of 22 people in the queen/king and 16 people in the double double room types, totaling 38 guests. The proposed 4 cottages will have a combined 6,000 SF footprint (1,500 ea. x 4 cottages) with a max occupancy of 24 guests. The proposed cottages, when compared to the existing motel, will result in a 1,100 SF smaller building footprint, a max occupancy of 14 fewer guests, and a more single-family like residential architectural design than the current, outdated, attached, linear, non-single family like motel structure.

C2: CLARIFICATION: Where can private events be held? Can they be hosted in the cottages? How would you control people having events in the cottages?

R2: As answered on the record, any planned private event/gathering will require a contract. Planned events can be held at various locations on the property including the indoor event space, the indoor/outdoor dining room and patio area, front lawn, courtyards, and pool area.

As stated in the previous response, the proposed cottages will, in every sense, take on the appearance of single-family residential home to blend with the surrounding character of the abutting properties. However unlike a residential home and property that does not need permission to expand lawns, have

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outdoor lighting, put up a tent, have cookouts and grill, provide amplified music, have parties, with unlimited numbers of guests, these cottages will be part of the Wake Robin Inn Property and as such, held to the special permit conditions regarding clearing limits, noise, parking, lighting, storm water quality and environmental, and landscaping.

The applicant has committed to requiring private events serving alcohol inside the “event space” which are greater than 50 guests to hire private security for the duration of the event.

C3: Are the cottages treated as one single unit?

R3: Yes, they are treated as a suite and are able to be booked by the hotel reservation system with a maximum occupancy of 6 people.

C4: Can you function without the outdoor music at the pool?

R4: We have listened to feedback and concerns from the commission members and although we feel that this music will only create ambience at the pool area and will not be a nuisance to neighboring properties, we will remove the plan for regularly played background music at the pool area.

C5: Clarify the number of cottages and structures on the current Granbery parcel and what is being proposed?

R5: Currently, there are four structures on the Granbery parcel having the following total building footprint: 1,904 sf house, 958 sf cottage, 650 sf garage, and 124 sf shed. There are a total of **6** bedrooms in the existing Granbery structures (main house + cottage). The main house also includes a large room (currently an art studio) that could easily be converted into an additional bedroom. In addition, the 2-bay garage that exists on the property which currently functions as a studio/storage area could also be converted to a bedroom as well. Thus, the current state of the Granbery parcel can easily be converted into an 8-bedroom property.

The proposal includes 2 cottages with 2 bedrooms in each, totaling **4** total bedrooms, thus 2 less bedrooms than what is currently on the Granbery property.

Footprint Comparison

Current Footprint = 3,636 sf

Proposed Footprint = 3,958 sf (includes preserving a 958sf garage for Inn storage)

Bedroom Comparison

Current Bedrooms = 6

Proposed Bedrooms = 4

C6: Can you run this business without the Granbery property? How would what you are planning be substantially different from what is there now in relation to the Granbery parcel? How would the Granbery property if it stayed how it was act as a buffer for your activities? The Granbery property is altering more of the residential character; knowing you have the 10+ acres on the WR property, how important is that parcel to your project? Why is the Granbery parcel essential to the operation of the hotel?

R6: Historically the Granbery parcel was part of the Wake Robin Inn and the Taconic School for Girls. Dating back to the 20th century days, the Granbery parcel supported amenities for the school and then the Inn. The previous application proposed 8 cottages on the Granbery property, with a much greater building footprint than what is being proposed in this application. Throughout the hearing process and listening to both commissioner and public feedback, it was suggested that "...another approach could be simply a further reduction of the development activity on the Granbery parcel". The new application includes only 2 cottages and a reduction of 2 bedrooms from what is currently on the property. The proposed cottages were designed and strategically located on the Wake Robin and Granbery properties to create a sense of separation and buffer both internally to the proposed Inn operations and externally to neighboring properties. The current design and locations of the proposed cottages blend with the surrounding residential character of the neighborhood, increasing the buffer from Wells Hill Road from what is there now. By re-including the Granberry parcel as part of the Wake Robin Inn property, it emphasizes the importance of controlling the cottage uses via the special permit conditions as detailed in Response #2 which will benefit both the neighboring properties and the Wake Robin Inn.

The single family 'character' will be improved and maintained by this applications enhancements listed below:

- Removing the unnatural white vinyl fence along Wells Hill Rd
- Removing the invasive plant materials along the existing stream & wetland corridor which runs through both properties
- Implementation of engineered stormwater treatment and quality enhancements
- Invasive tree species removal and replanting of native species
- Beautification and naturalizing of the streetscape along Wells Hill Rd
- Locating proposed cottages so they are not visible from Wells Hill Rd

- Creation of an emergency access only, gated, driveway access onto Wells Hill Road.
- Building a small fraction of building SF and impervious coverages allowed as of right on the property.

If the Granbery property was not included in the proposal, it would be heavily impacted by the proposed use, or the fully allowed current use, of the Wake Robin Inn due to its close proximity to the Inn. All the below are aspects that would impact the Granbery property, neighboring properties, and the Town as a whole, if the Granbery property was not included in the proposal:

- All existing structures (outdated) to remain
- White vinyl fence along Wells Hill Rd to remain
- Watercourse & wetland to remain overgrown
- No stormwater treatment or management improvements
- No control or removal of invasive species
- Overgrown shrubs and trees along Wells Hill Rd
- Existing houses fully visible from Wells Hill Rd
- Driveway to remain open with full unrestricted access of entering & exiting traffic onto Wells Hill Rd from both the Granbery parcel and the Wake Robin Inn. The proposed limiting of the existing driveway to emergency access only with gate, will not be allowed due to the fact that the driveway is owned by the Granbery parcel.

The following scenarios are not currently being proposed but are potential scenarios if the Granbery property remains a separate property and does not require P&Z approvals. Operate the property as a farm; Construct and build a new 5,000+ SF house; Operate under a separate entity as an Airbnb and promote outdoor tented events on the Granbery parcel (no approvals needed); 6-unit apartment building.

To note, both properties (Granbery parcel and Wake Robin Inn) are in the RR-1 zoning district. A zoning lot merger is permitted and can be a conditional of approval of this application. Any further expansion or acquisition of a neighboring property requires a new special permit and public hearing process.

The inclusion of the Granbery parcel in this application is a significant benefit to the surrounding properties, as well as an integral part to the planning of the Wake Robin Inn and its operations.

C7: If you did everything you are allowed to on the current WR property/hotel as it exists today, how would that noise level be? If you were to use what you have as of right, as a non-conforming pre existing Inn, and maxed out what you could do there (lawn weddings, amplified music, etc.) how different is that

going to be? Would that be more or less noise? Everyone has focused on the number of rooms and square footage expansions, but they haven't focused on the concept of fixing it up (public has mentioned numerous times to "just renovate what's there")...if you did that and maximized the use, what would that look like? If you were to intensify the current use, which would "easily fit within the towns regulations" what would the acoustical arrangement be because more tented events would be allowed and would generate a fair amount of noise and traffic? How would that intensification vs expansion effect the outcome of the immediate community?

R7: Simply put, the Wake Robin Inn could be restored, without expanding the footprint, to its former state as a fully functioning destination Inn/motel, restaurant, and regional event venue. Operating fully within the existing zoning regulations with no limitations on outside event size (not requiring a special permit) and including or not including the following:

- Self-parking at existing formal and informal parking areas would be utilized for parking cars including but not limited to parking along the internal access driveway, gravel parking area at Inn, with primary satellite parking at gravel/grass lot along Wells Hill Road (approx. 50 Cars) and the great lawn.
- Tented or non-tented outdoor events, any day or night of the week, with amplified music/bands on the property including but not limited to all existing lawn areas (great lawn, Wells Hill Road lawn/gravel parking, and motel area lawn).
- Indoor restaurant & ballroom event any day of the week, with amplified music/bands
- Maintain all vehicular access (entering/exiting) onto Wells Hills Road
- Maintain access onto Sharon Road with no sightline improvements required (bend in the road).
- Construction of a new pool on the property with background music (pool permit/agreement required)
- Business plan changes resulting in a less luxurious product catering more towards budget travelers with less amenities ("motels" are currently not permitted in the RR-1 zoning district)

Overall, the proposed application is seeking a special permit and is reducing what the applicant is allowed to do on the property, thus giving the commission more control. Specifically, the application addresses the current use of the Inn and the potential outdoor events (no restrictions) being limited via a special permit and constructing a newly designed acoustic structure. Cavanaugh Tocci, acoustical consultant, analyzed the difference between potential outdoor events (currently permitted) and potential interior events as part of this application, and has come to the conclusion that "music sound produced during outdoor

tented events.... could potentially be perceived by residents as well more than quadrupling from those anticipated under the proposed design before the PZC.”

C8: What is the representation of the current iteration from the former application? Please show the comparison (numbers) between the applications:

R8: See below comparison table that illustrates the maximum allowed per the zoning regulations compared to the original application, withdrawn application, and current application proposal. There are reductions in all areas from the previous application and clearly illustrate the fraction of what is being proposed in comparison to the maximum allowed per the regulations.

	Maximum Allowed Per Current Zoning Regulations	Original Application (Aug 2024)	Withdrawn Application (Dec 2024)	NEW Application (Apr 2025)
Number of Guestrooms	86	57	53	53
Number of Cottages	7	14	12	4
Total Keys (total hotel rooms)	93	71	65	57
Total Buildings Square Footage (sf)	240,352 sf	75,306 sf	74,294 sf	67,950 sf
Maximum Occupancy (guestrooms)	271	246	212	166
Anticipated Occupancy	212	186	158	130
Peak Traffic Count (# of cars) <i>With Event / No Event</i>	225/200	171 / 197	171 / 197	150 / 175
Event Space Square Footage (sf)	9,013 sf	12,029 sf	5,712 sf	5,430 sf
Building Coverage (sf)	60,088 sf	45,667 sf	40,859 sf	36,653 sf
Building Coverage (% of total lot)	10.00%	7.60%	6.80%	6.10%
Landscaping & Vegetation	Not Required	Invasive Removal & Landscaping Plan Proposed	Invasive Removal & Landscaping Plan Proposed	Invasive Removal & Landscaping Plan Proposed

Note: the “maximum allowed per zoning regulations” values are pro-rated based on the same ratios in the new application. The building coverage (10%) is the true maximum allowed and therefore the total building square footage (240,352 sf) assumes all structures are 4 stories with a maximum of 35’ height.

C9: The statement was made by SLR that “traffic in 2006 was greater than now.” Since Covid the traffic has been greater.

R9: The Exhibit at the end of this letter shows Annual Average Daily Traffic (AADT) volumes at CTDOT's many Traffic Monitoring Stations near the site. CTDOT monitors roadway traffic levels at specific locations throughout the state on typically a three-year cycle (sometimes less frequently at some locations, sometimes more frequently). The most recent CTDOT traffic monitoring counts near the site were collected in 2024. As shown, daily traffic volumes have declined steadily in Lakeville since 2006 according to CTDOT, including the post-COVID-19 years. For example, CTDOT's traffic monitoring station on Sharon Road near Wells Hill Road shows that the average amount of daily traffic on Sharon Road was 5,500 vehicles in 2006, 5,200 vehicles in 2009, 4,800 vehicles in 2020, 4,900 vehicles in 2021, and only 4,400 vehicles in 2024. A link to the CTDOT traffic monitoring data online can be found at the bottom of the graphic. To note, the data is collected and published by CTDOT, not SLR Consulting.

C10: How would the Granbery property be a buffer to the Kalison property?

R10: As answered above in response #6, we feel strongly that the Granbery parcel will benefit the surrounding properties more if it is part of this application and part of the Wake Robin Inn program. Inclusion of the Granberry property allows the control of the clearing limits, proposed landscaping, proposed uses, proposed activities, and much more stringent noise, use, and occupancy limits than if the property remained a single-family residence. Although building setbacks allowed per zoning could be reduced to a 30-foot minimum, this plan provides for over 100 feet of wooded buffer from the Kalison property boundary to the nearest cottage.

C11: The commission has requested the applicant to respond to the numbers below that a member of the public had said on the record:

*# of rooms going from 40 – 53 (50% increase) ***(33% increase)**
Event space going from 1,500* – 5,430 (300% increase) ***does not include the capacity for outdoor events.**
Buildings total going from 36,000 - 67,000 (200% increase)
Max occupancy increased by 75%
Cars, employees, etc. all increasing*

R11: The above-mentioned numbers from a member of the public are partially correct when comparing the existing Inn to the proposed application. However, that same person said: “the right question to ask yourselves is what do we have today and what will it become, and what will that impact be”. We also agree with that statement and reference our previous responses #7 and #8 and note that our project proposes a fraction of what the allowable expansion

and development per the zoning regulations allow, while also proposing a less invasive & nuisance prone property by submitting a special permit application.

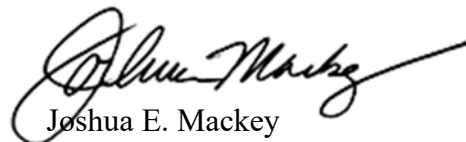
The table included at end of this response letter illustrates what is present on the property, what is being proposed, and what is allowed (maximum) under the current Zoning Regulations. The increase in the number of guests, rooms, square footage, building footprint, cars, employees, etc. is a moot point given that if the regulation was that you could never increase the above by anything, even though it was below the maximum, then no single family home in town would ever be able to obtain a permit to expand its deck, add a bedroom, add an accessory dwelling unit, build a pool, expand its driveway, etc. The Zoning Regulations have maximum numbers for a reason, and the proposed project is significantly below (40%) the allowable building coverage, which is the driving factor for all other numbers. The common misconception throughout the application process is that “you cannot build more than what is there” or “the project is too big”, particularly regarding the event space. The current event space is a single room that does not have any buffer (1,500sf), is severely outdated (construction), and does not include the square footage of the outdoor events. The proposed project has a ballroom space of 2,660 sf which includes vestibules on both sides of the structure to act as a buffer to encapsulate guests and sound.

Section 803.2 does not state that a more intense use is prohibited. Section 803.2 of the Zoning Regulations allows greater intensity of a site so long as that use does not create nuisance-type conditions. The application has addressed all of the nuisance-type conditions via various different reports and documents which the commission’s third-party consultants have concurred.

Should you have any questions, please feel free to contact me at jmackey@mbwlawyers.com.

Sincerely,

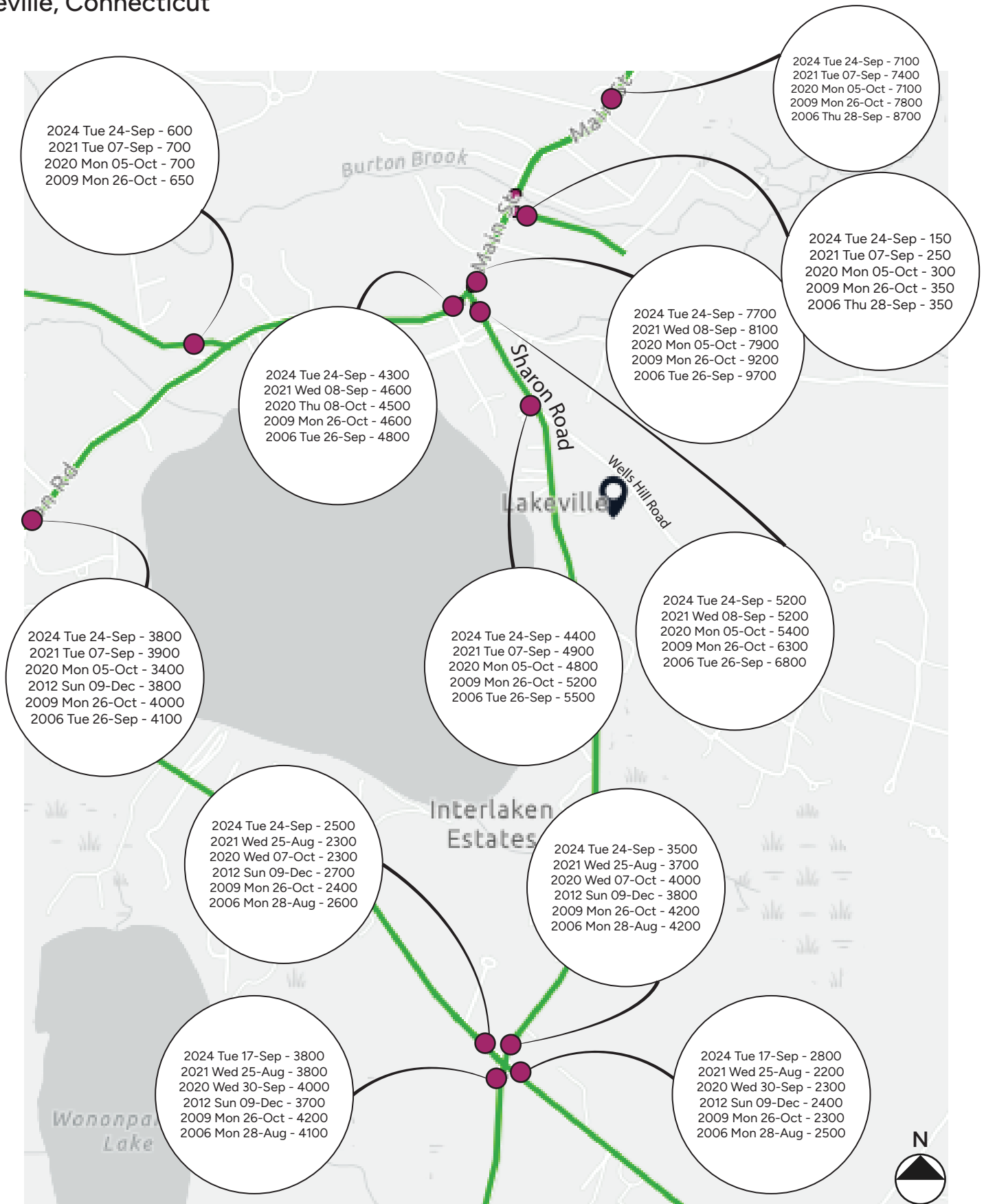
MACKEY BUTTS & WHALEN, LLP



Joshua E. Mackey

cc: ARADEV LLC

CTDOT Annual Average Daily Traffic (AADT) Data near 104 & 106 Sharon Road and 53 Well Hill Road, Lakeville, Connecticut



Source: CTDOT Traffic Monitoring Station Viewer

<https://experience.arcgis.com/experience/d564f7034e7446d69c0ab34df98989d6>

Current vs. Proposed vs. Maximum Allowable Use - Zoning Table

#2025 – 0287: Wake Robin Inn Redevelopment

8/19/2025

	Maximum Allowed Per Current Zoning Regulations	Current/Existing Properties	New Application (Apr 2025)
Outdoor Events Until 10pm Amplified Music	Allowed	Allowed	Not included in application - NOT ALLOWED
Hours of Operation (Events) OUTSIDE	No formal end time	9am - 10pm	9am - 8pm
Hours of Operation (Events) INSIDE	7am - 2am	7am - 2am	9am - 12am
Sound & Noise Limitations	Not Required; no sound ordinance	No ordinance or restrictions	Included
Traffic Study & Report	Required	N/A	Included
Appropriate Site Line (enter + exit)	Required	No engineered plan on file	Included
Entrance & Exit on Wells Hill Rd	Allowed	Permitted	Not Allowed
Sanitary Sewer	Required	No. Above ground exposed pipe	Engineered WPCA Approval
Engineered Stormwater Mgmt/Quality	Required	None	Included
Property Line Foot Candle Value	0.00	Not known. No engineered plan on file	0.00