



The Miller Planning Group
Land Use Solutions

Planning Analysis

Application for Wake Robin Redevelopment

104-106 Sharon Road and 53 Wells Hill Road, Salisbury, CT

Submitted To Salisbury Planning and Zoning Commission
Application # 2025-0287

August 25, 2025

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August 25, 2025

Dr Michael Klemens, Chairman
Planning and Zoning Commission
Town of Salisbury, CT

Dear Chairman Klemens and Members of the Planning and Zoning Commission

I am submitting this Planning Report to the Salisbury Planning and Zoning Commission for your consideration regarding Application #2025-0287, the Wake Robin proposal, for Site Plan and Special Permit Approval.

I would be pleased to answer any questions from you and the Commission at the appropriate time.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Brian J Miller".

Brian J Miller, AICP

Contents

1. Conclusion.....	2
2. Purpose	3
3. Proposed Development.....	3
4. Findings.....	5
4.1 Comparison of Existing Conditions and Proposed Development.....	5
4.2 Comparison with 2024 Withdrawn Application.....	7
4.3 Mixed Use Development Not Permitted by Zoning	7
4.4 Impact of Individual Uses	8
4.5 Affordable Housing.....	9
4.6 Traffic.....	9
4.7 Pedestrian Transportation	9
4.8 Sanitary Sewer.....	10
4.9 Commercial Sprawl.....	10
4.10 Parking.....	11
4.11 Environmental Factors	12
4.12 Economic Considerations	12
4.13 Enforcement of the Zoning Regulations	13
5 Zoning Compliance of the Application.....	14

Appendix A- Planning Analysis, 104-106 Sharon Road and 53 Wells Hill Road, Salisbury, CT”
Submitted to Salisbury Planning and Zoning Commission November 13, 2024, by Miller Planning
Group

Appendix B “Current vs. Maximum Amount of Building and Landscaping – Zoning Table”
attachment to letter from Attorney Joshua Mackey to Salisbury Planning and Zoning
Commission; August 12, 2025.

Appendix C Noise - Section 22a-73 Connecticut General Statutes

Appendix D -Statement of Qualifications

1. Conclusion

The following conclusions summarize the analysis of this report.

1. The proposal should be evaluated on its own merits, but when compared with the 2024 application, this application is only slightly smaller. This application will generate virtually the same negative impacts of the previous application.
2. The proposal does not conform to the Salisbury Zoning Regulations.
3. The proposed development would create an isolated, high-activity commercial center in place of quiet, low-activity use amid a rural residential neighborhood.
4. The “controls” proposed by the applicant to mitigate the adverse impacts are inadequate. For example, the applicant proposed a finite number of events with 100 guests or more. This still could result in an unknown number of events with up to 99 guests. And how will the Town or neighbors know how many guests there are at each event?
5. Zoning control of these potential problems is complex and reactive and does not provide adequate control in this situation. The ZEO is not available at night and lacks the authority to address issues related to noise, lighting, or human behavior.
6. The development may establish a precedent for other similar developments throughout other vast areas within the RR1 zoning district.
7. There are other potential uses for the property that would not disrupt the neighborhood. Alternative potential reuse includes repurposing the existing hotel building into apartments and developing the entire site for residential purposes. This could include affordable units.
8. The applicant indicated a lack of understanding and/or disregard for the special permit process, as demonstrated in the August 12, 2025, letter from Attorney Mackey. The last two pages were a comparison of the current application with the existing situation, as well as three other development scenarios. One of the was “Maximum Allowed for Current Zoning.” It used residential standards and ignored the role of the Planning and Zoning Commission in determining the granting of Special Permits in that scenario. Their hypothetical scenario would have no chance of approval. The analysis indicates the development of 240,352 square feet of building space, which would be a four-story building with a coverage of 60,000 square feet. I leave it to the Commission to understand the intent of this “analysis.”¹

¹ See Appendix B

2. Purpose

I have been asked to conduct a critical analysis of the potential land use planning issues to be considered in the application submitted by Wake Robin LLC and Serena Granbery for the redevelopment of a site at 104-106 Sharon Road and 53 Wells Hill Road, Salisbury, Connecticut.

This application is like the one submitted in 2024, which was withdrawn. We have submitted a complete analysis of the 2024 application, which is included in this report (Appendix A), as the background data remains unchanged. This report examines how the current application impacts the critical factors affecting the Town and the neighborhood.

We recognize that the Planning and Zoning Commission must consider numerous factors when evaluating all land use applications to make informed decisions. The current applications, like many others, have both positive and negative characteristics and impacts. The applicant has presented the positive aspects of the application; this analysis aims to highlight some additional factors that the Commission should consider.

This application is slightly smaller than the 2024 application, but the fundamental problems with the proposal remain unchanged. The applicant has made numerous comparisons; however, the establishment of a high-intensity commercial development within a rural residential neighborhood remains a concern, as it may result in various impacts on the surrounding area.

3. Proposed Development

According to the Statement of Purpose, which is part of the application, the proposal includes a complete redevelopment of the site, turning it into a “boutique hotel that will serve both the local Salisbury and greater areas.”² The application plan includes the following components in addition to the 57-room hotel expansion.³

Event Space

- Most Events on Friday & Saturday could be on other days.
- 4 PM to 12 AM for weekends and holidays
- 9 AM to 10 PM for Monday – Thursday
- Capacity 125 guests
- Useable space: 4,680 sq ft

Fast Casual Restaurant (outdoors) 30-40 people anticipated.

- Open daily 11 AM to 5 PM

² Page 32 of 644 of “Application for Site Plan Special Permit Approval”

³ Pages 32 & 33 of 644 of “Application for Site Plan +Special Permit Approval”

- Order at the counter and outdoor seating and benches
- 500 to 600 sq. ft. in the basement of the main building
- Open to the public

Restaurant – Bar

- Restaurant three meals/day 7 AM to 10 PM Monday, Tuesday, Wednesday, and Thursday, 7 AM to 11 PM Friday, Saturday, Sunday, and Holidays
- Bar opens from 11:00 AM. Closing time is not specified in the Project Overview.
- “Maximum_seating and standing capacity to be determined at building permit stage.
- Useable Space 3,000 sq. ft.

Spa-Gym

- Useable space 4,550 sq. ft.
- 7:AM to 7:PM
- Open to the public

Pool

- 1,000 square foot pool
- 2,250 sq. ft. pool deck
- 1,160 sq. ft. building for restrooms and storage
- No restriction on music at the pool is indicated.
- 9 AM to 8 PM daily
- Capacity 40-50 people

Spa

- 4 to 5 treatment rooms
- Open to the public
- 7 AM to 7 PM

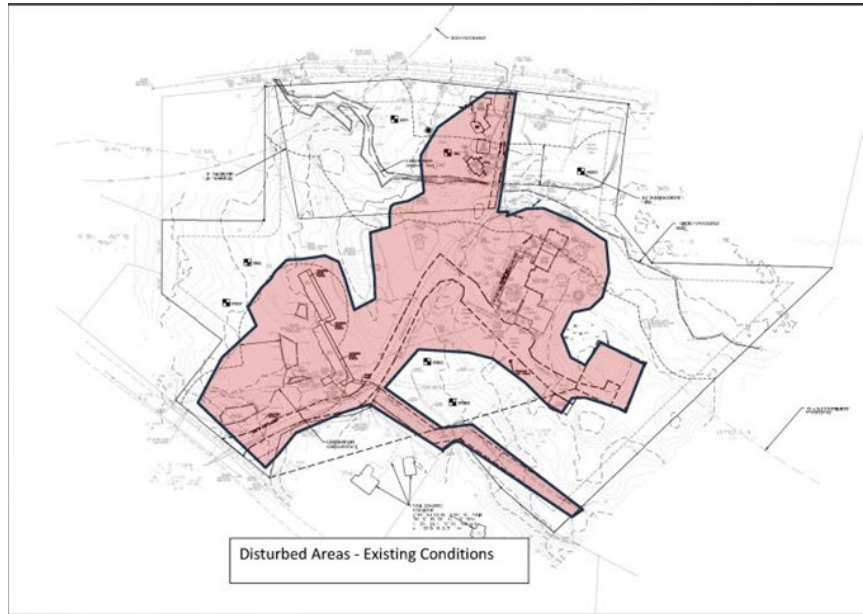
Cottages

- Expansion of the four cottages
- Cottage size: 2,000 square feet, with an occupancy of 6 guests each.

4.Findings

4.1 Comparison of Existing Conditions and Proposed Development

The proposal would be a significantly larger and more intensive use of the property than its current use.



Existing Disturbance Area



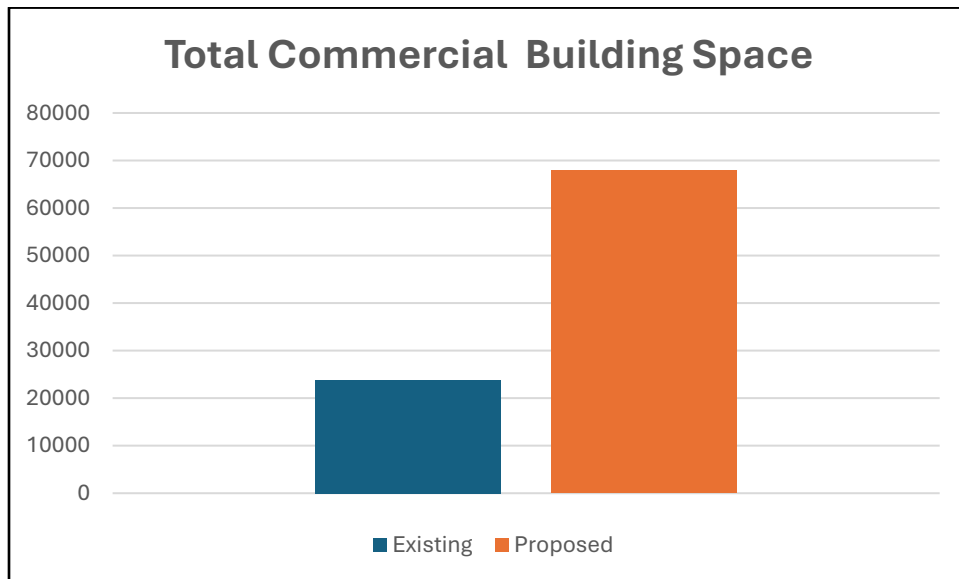
Proposed Disturbance Area

The magnitude of the proposal is illustrated in the two plans above. The top map shows the extent of existing disturbed areas, and the bottom map shows the proposed plan, indicating that the

disturbed, developed areas would encompass almost the entire parcel, right up to the property boundaries.

Table -Comparison of Existing Situation and Proposed Development

	Existing	Proposed	Difference	% Increase
Guest Rooms ⁴	23	57 ⁵	+31	+119%
Commercial Building Space	23,848 sf	67,950 sf ⁶	+44,102	+185%



⁴ The guest room count is based upon year-round units.

⁵ Page 33 of 644 of "Application for Site Plan +Special Permit Approval"

⁶ Page 34 of 644 of "Application for Site Plan +Special Permit Approval"

4.2 Comparison with 2024 Withdrawn Application

We believe that, as a new application, this should be evaluated and acted upon based on its own characteristics. However, the opponents were encouraged to focus on the differences between this application and the 2024 application. This analysis has determined that the impacts from the 2025 application are the same as those of the 2024 application.

- It is too large and out of scale with the surrounding area,
- It is not harmonious with the neighborhood, and,
- The capacity of the sewer system to accommodate the development is once again conditional, and the third-party study did not consider any of the other pending (both planned as well as underway) projects and developments.

The following Table summarizes the relevant characteristics of the two proposals.⁷

	2024 Application	2025 Application	Difference	%change
Guest Rooms Keys*	65	57	-8	-12%
Total Buildings sq ft	74,294	67,950	-6,344	-9%
Event Space	5,712	5,430	-282	-5%

*The four cottages will be expanded and able to accommodate more guests each.

4.3 Mixed Use Development Not Permitted by Zoning

This application seeks approval for a mixed-use development with independently operating components. Each community can and does define mixed uses differently. Whether it fits some definitions or not is irrelevant.

The intent of the zone indicates that it does not permit large-scale commercial developments, as stated in Section 206.2 of the zoning regulations and shown below:

The purpose of these zones, which encompass most of the Town's geographic area, is to provide for residential housing, as well as agricultural and other uses that are compatible with the rural residential–agrarian character of the Town and consistent with topographic, soil, wetland, and water resource development limitations. The RR-1-V zone is a transitional area between small-lot village residential zones (R-10 and R-20) and larger-lot rural residential zones (RR-1 and RR-3), where public water and sewer service may permit housing clusters designed to maintain open space and entryways to the village centers.

⁷ Letter dated August 12, 2024, from Attorney Joshua Mackeyto Salisbury PZC

The proposed hotel would not be in conformance with the intent of the zoning regulations. As previously indicated, the proposed development would significantly increase the commercial use of the property, as described above.

4.4 Impact of Individual Uses

Each of the proposed uses and facilities raises concerns about potential impacts.

a. Event Space

- Maximum capacity is 125 people, which is a large crowd of people for a quiet rural neighborhood. Guests at parties or celebrations tend to be noisy, especially when alcohol is available.
- There is no maximum number of events with fewer than 100 guests. An event with 90 guests or other attendees could still be very noisy.
- The hours of operation for the Event Space and Restaurant Bar go as late as midnight for weekends and holidays, and 10 PM for other days. We understand that this is not unusual for businesses of this type, which are typically located in commercial areas. However, it would be a nuisance for a rural resident to create a public nuisance and be disruptive to the neighborhood,
- The term “Special Events” can encompass and not be limited to events like weddings.
- Tent events could be a significant component of the proposed business. These events will be a substantial source of noise. Although the applicant indicated that the tent activities will not go past 8:00 PM, the application does not include any limit for the number of tent/outdoor events.

b. Restaurant Bar

- Late hours, 10 PM weekdays; midnight, weekends and holidays
- Open to the public

c. Pool

- Music to be played at the pool

4.5 Affordable Housing

The town of Salisbury has been addressing the issue of affordable housing for several years. There are many factors, but one that is often emphasized is the impact on local businesses. Many of the service businesses within the town struggle to attract employees due to the lack of affordable housing.

The proposed development is expected to employ up to 72 employees, according to the application materials. The wages of hospitality and restaurant employees are generally low. It raises the issue of where these employees would live. This is likely to exacerbate the affordable housing situation rather than contribute to a solution.

4.6 Traffic

The traffic report included within the application focused on comparison with the previous application. This comparison is irrelevant. The real issue is how much traffic will be added to the existing situation.

This traffic study, like most standard traffic studies, focuses on enabling automobiles to travel through the area as quickly as possible, thereby avoiding congestion situations. It does not measure the impact of the increased traffic on any quality-of-life issues. Neighborhood residents enjoy walking, jogging, and cycling along the roads. The Commission is empowered to utilize its knowledge or public testimony concerning neighborhood impacts of increased traffic.

This project will significantly increase the amount of traffic, which would detract from the quality of life of all residents in that neighborhood.

4.7 Pedestrian Transportation

The impact on pedestrians and bicycling is no different than the concerns expressed for the 2024 application. Hotchkiss Students will continue to walk up the road into Lakeville, and residents would like to see the walking and bicycling along the road continue.

4.8 Sanitary Sewer

The Draft 2024 POCD Sustainable Salisbury summarized relevant studies done on the sanitary sewer system. The finding that “the Town’s existing sewer facilities are in relatively good operating condition...”⁸

“Proposed developments and changes in residential use patterns could easily overwhelm the existing capacity of the sewage treatment plant. Most recent estimates indicate, after the completion of Sarum Village III, the remaining sewer reserve capacity is around 200 bedrooms. Historical sewer usage data cannot solely be relied upon as a foundation for future planning. For instance, the possibility of increasing year-round use of existing residences should be considered, as well as the potential for infill development and/or expansion within the villages.”

The proposed development, which includes a restaurant, event center, spa, pool, and 57 guest rooms, is expected to increase sewage flows significantly. Even if it is determined that the system can currently accommodate this proposed development, it will utilize a significant portion of the available capacity that may be needed for other, higher-priority needs, as described in the above paragraph of the Plan of Conservation and Development.

The Water Pollution Control Authority only granted contingent approval, subject to improvements in downstream collection. However, there may be capacity limitations at the treatment plant. No comprehensive study has evaluated whether the entire system can support other potentially beneficial developments. Approving this application may restrict or hinder other community projects that could be more beneficial to the Town by limiting available sewer capacity.

4.9 Commercial Sprawl

My comments concerning “Commercial Sprawl” in the 2024 application remain unchanged with the 2025 application. This proposed commercial center will be situated adjacent to the existing single-family homes in a rural residential environment.

As previously described, this proposal would transform a small, low-impact business into an intensive commercial hospitality and entertainment destination, with negative impacts on the surrounding neighborhood. From a personal perspective, with over 40 years of experience, I cannot recall any community in recent years permitting the establishment of a new commercial center in a similar rural area.

⁸ Page 60 of 2024 POCD Sustainable Salisbury

The border or interface between commercial and residential uses is always subject to potential adverse impacts on the residential sector, including noise, traffic, safety, lighting, and activity. Many communities face inherent problems associated with adjacent commercial and residential uses, but these situations often result from long-standing existing development and/or zoning patterns. It is highly unusual for a town to create a new, potentially difficult situation voluntarily.

Although the term is no longer commonly used, this proposal could be considered a form of “spot zoning.”

- a. This would be contrary to long-held community planning practices. It is inconsistent with the Town’s Draft POCD, which calls for commercial development within the Town’s designated village areas. (See POCD map in Appendix A). This proposed commercial use is not within the limits of the Lakeville village area. The process of formulating the POCD had the recent opportunity to include a recommendation for this type of development. Instead, they determined that the existing development patterns of the rural residential area should not be changed.
- b. The approval of this application may also start a precedent to encourage or permit new freestanding hospitality–entertainment resort centers at other locations throughout the community.
- c. It is hard to understand why the Planning and Zoning Commission would deviate from a recently approved Plan of Conservation and Development by permitting the introduction of a significant commercial development within the RR-1 zone.

4.10 Parking

The site plan shows a total of 175 parking spaces, excluding the lawn area.

The applicant submitted a “Parking and Occupational Analysis,” which examined the parking needs of different use and season scenarios, based upon the number of guests. Their analysis included several scenarios and assumptions, which are the same as those used in the 2024 analysis. These assumptions include 2.5 guests per car, which seems optimistic, and the overlap of parking for multiple uses. These assumptions may undercount the need for parking.

The application indicates the use of valet parking. Valet parking is usually utilized to park vehicles in off-site locations. No off-site location was presented, except for a discussion about parking vehicles on the public road. The two adjoining roads are wide enough for only two lanes of traffic. The shoulders of these roads are not broad enough to accommodate much parking. Therefore, parking on the road is probably illegal and definitely dangerous. If another off-site parking area is contemplated, it should be presented as part of the application.

4.11 Environmental Factors

The potential environmental factors discussed within the context of the 2024 application have not changed. Most of the site will be regraded, paved, and built upon.

4.12 Economic Considerations

The application narrative states: “The site is uniquely positioned to meet a demonstrated and growing need for high-quality lodging accommodations in the region...”⁹ There may be an economic demand for lodging in northwestern Connecticut, but this should not be confused with the needs of the Town. Demand is not a consideration of the Planning and Zoning Commission.

The applicant has stated that the proposed development would result in the creation of new jobs. Hospitality businesses often employ staff with low wages, including parking valets, cleaning workers, landscapers, and maintenance personnel. There is no evidence suggesting that additional jobs of this type are necessary for the Town. The reverse is true, as the Town has been aggressively addressing the need for housing for the employees of existing retail and service businesses.

⁹ Page 9 of 644 of “Application for Site Plan Special Permit Approval”

4.13 Enforcement of the Zoning Regulations

The application has included numerous promises concerning the operation of this facility in response to the public's concerns about lighting, noise, and safety. Assurance that these promises will be adhered to would require a significant amount of monitoring on behalf of the Town. As a small, quiet rural town, Salisbury lacks the resources to ensure that all of these representations of the applicant will be followed. Potential noise, lighting, and safety would need to be strictly enforced by the Town to prevent these possible adverse impacts from degrading the quality of life of this neighborhood.

Specific problems include:

- The Land Use Department is staffed with a Director of Land Use and a Land Use Technician who, along with the Planning and Zoning Commission, are responsible for the enforcement of the zoning regulations, along with a range of other duties. They have standard working hours from Monday through Thursday and would not be available to monitor the most critical hours of the events' activities.
- The Zoning Enforcement Officer does not have the authority to enforce noise. Section 22a-73. Municipal noise regulation programs: ordinances subject to the commissioner's approval require that noise be regulated by an ordinance, which the Commissioner of the Department of Energy and Environmental Protection must approve. (Appendix C).
- The enforcement of regulations is, by State Statute, an expensive and lengthy process involving extensive work by the Zoning Enforcement Officer and the Town Attorney.
- At the last hearing, the attorney for the applicant reminded the Commission as well as other participants that the applicant cannot be responsible for what the Town can and cannot do.

5 Zoning Compliance of the Application

This project is not in conformance with the Plan of Conservation and Development nor the Salisbury Zoning Regulations, for all the reasons stated above within Section 7, Findings.

More specifically, the application does not meet the following sections of the Zoning Regulations, with particularly relevant sections highlighted.:

802.1 Purpose

b. Ensure that the design and layout of the site and the proposed use(s) will constitute suitable and appropriate development in character with the neighborhood and will not result in an unreasonable decrease in property values or a detriment to the present and potential use of the area in which it is to be located.

803 Standards for Special Permits

803.2 Relation of Buildings to Environment

The size and intensity, as well as the design, of the proposed project or development shall be related harmoniously to the terrain and the use, scale, and siting of existing buildings in the vicinity of the site. The use shall not create a nuisance to neighboring properties, whether by noise, air, or water pollution, offensive odors, dust, smoke, vibrations, lighting, or other effects.

803.3 Neighboring Properties

The proposed uses shall not unreasonably adversely affect the enjoyment, usefulness, and value of properties in the general vicinity thereof or cause undue concentration of population or structures. In assessing the impact on surrounding properties, the Commission shall consider the following factors, among others: existing and proposed pedestrian and vehicular circulation, parking and loading plans, stormwater management systems, exterior lighting, landscaping, and signage.

206.2 Single Family Residential Zones (RR-1-V, RR-1, RR-3)

The purpose of these zones, which encompass most of the geographic area of the Town, is to provide for residential housing, as well as agricultural and other uses that are compatible with the rural residential–agricultural character of the Town and consistent with topographic, soil, wetland, and water resource development limitations. The RR-1-V zone is a transitional area between small-lot village residential zones (R-10 and R-20) and larger-lot rural residential zones (RR-1 and RR-3), where public water and sewer service may permit housing clusters designed to maintain open space and entryways to the village centers.

500.1 Definition

A non-conforming situation is a use, building, structure, or lot which lawfully existed at the time of the adoption of these regulations, or any relevant amendment thereto, that does not conform to the requirements of these regulations or such an amendment. These non-conforming situations consist of the following:

NON-CONFORMING USE – A non-conforming use is a use of a lot, building, or structure that does not meet the use requirements for the zone or overlay district in which it is located. A non-conforming use may be a non-conforming use of land and/or a non-conforming use of a building or structure.

500.2 Continuation of a Non-Conforming Use

As required by Connecticut General Statutes Section 8-2, these regulations do not prohibit the continuance of a non-conforming situation. With certain exceptions provided for this section, it is the intent of these regulations to reduce or eliminate non-conforming situations as quickly as possible.

501 Change of a Non-Conforming Use

501.1 The Commission may approve a change of a non-conforming use to another non-conforming use provided it finds the proposed non-conforming use will not have an adverse effect on the zone, the neighborhood or surrounding properties greater than the effect of the current non-conforming use. In making this determination, the Commission shall consider the character, nature, purpose and scope of the activity on the property, such as traffic, noise, lighting and other external factors affect the zone, neighboring or surrounding properties.

503 Enlargement of Non-Conforming use, Building or Structure.

503.1 No non-conforming use of land or non-conforming use of a building or a structure shall be extended to occupy a greater area, space or portion of such land, building or structure than was occupied or manifesting arranged for the use on the date that its non-conforming status was established.

503.2 Except as provided, below, no non-conforming building or structure shall be altered, enlarged, or extended in any way that increases the area or space, including vertical enlargement, of that portion of the building or structures that is non-conforming. For the purpose of this regulation, vertical is defined as an enlargement or expansion either upward or downward.

In all zones, except the LA zone, subject to approval of a Special Permit, the Commission may approve second-story additions or other vertical additions to the height or bulk of that portion of a residential building which is non-conforming in terms of minimum Yard Setback Requirements, provided:

- a. The proposed addition is designed to be compatible with the existing building in terms of architecture, materials, and appearance.

- b. The proposed addition does not project to the required minimum yard any further than the existing non-conforming building foundation or building façade.
- c. The Commission determines the application meets the General Standards for Site Plans and Special Permits, particularly sections 801.2, 801.3, 803.2, and 803.3.
- d. In evaluating the application and reaching its decision, the Commission shall take into consideration the degree of the existing non-conformity.

Appendix A

“Planning Analysis, 104-106 Sharon Road and 53 Wells Hill Road, Salisbury, CT” Submitted to Salisbury Planning and Zoning Commission November 13, 2024, by Miller Planning Group



The Miller Planning Group
Land Use Solutions

Planning Analysis

104-106 Sharon Road and 53 Wells Hill Road, Salisbury, CT

Submitted To Salisbury Planning and Zoning Commission

November 22, 2024,

Miller Planning Group
Wallingford, Connecticut

Contents

1. Purpose	2
2. Neighborhood Environment	2
3. Zoning.....	4
4. Plan of Conservation and Development	7
5. Site Characteristics	8
6. Proposed Development	10
7. Findings	11
7.1 Comparison of Existing Conditions and Proposed Development	11
7.2 Mixed Use Development not Permitted by Zoning.....	12
7.3 Impact of Individual Uses.....	13
7.4 Affordable Housing	14
7.5 Traffic Impact.....	14
7.6 Pedestrian Transportation.....	15
7.7 Sanitary Sewer	15
7.8 Commercial Sprawl	16
7.9 Parking.....	17
7.10 Environmental Factors	17
8. Conclusion.....	18
Appendix A – Map of Villages	21
Appendix B	23
Appendix C - Proposed Wake Robin Inn Redevelopment – Sewer Gallons per Day Calculation, September 27, 2024.....	24
Appendix D –Statement of Qualifications.....	27

1. Purpose

I have been asked to do a critical analysis of the potential land use planning issues to be considered for the application submitted by Wake Robin LLC and Serena Granbery for the redevelopment of a site at 104-106 Sharon Road and 53 Wells Hill Road, Salisbury, Connecticut.

We recognize that the Planning and Zoning Commission must consider many factors regarding all land use applications in making their decision. The current applications, like many others, have both positive and negative characteristics and impacts. The applicant has presented the positive side of the application, this analysis is intended to provide some other factors that the Commission should consider.

2. Neighborhood Environment

The neighborhood around the subject site is a heavily wooded rural area, approximately one-half mile southeast of the Lakeville Village area, and one-quarter mile from Wononscopomuc Lake. The Hotchkiss School is approximately one mile south of the subject area.

The area is dominated by the natural environment, and includes areas of woods, fields or pastures. Aside from the Wake Robin properties, all the other buildings within the neighborhood, as defined within one thousand feet surrounding the subject site are a church, single-family homes of different lot sizes, and building ages, as indicated on the following map.

Town of Salisbury, CT

Geographic Information System (GIS)

plan rev. 10/14/24

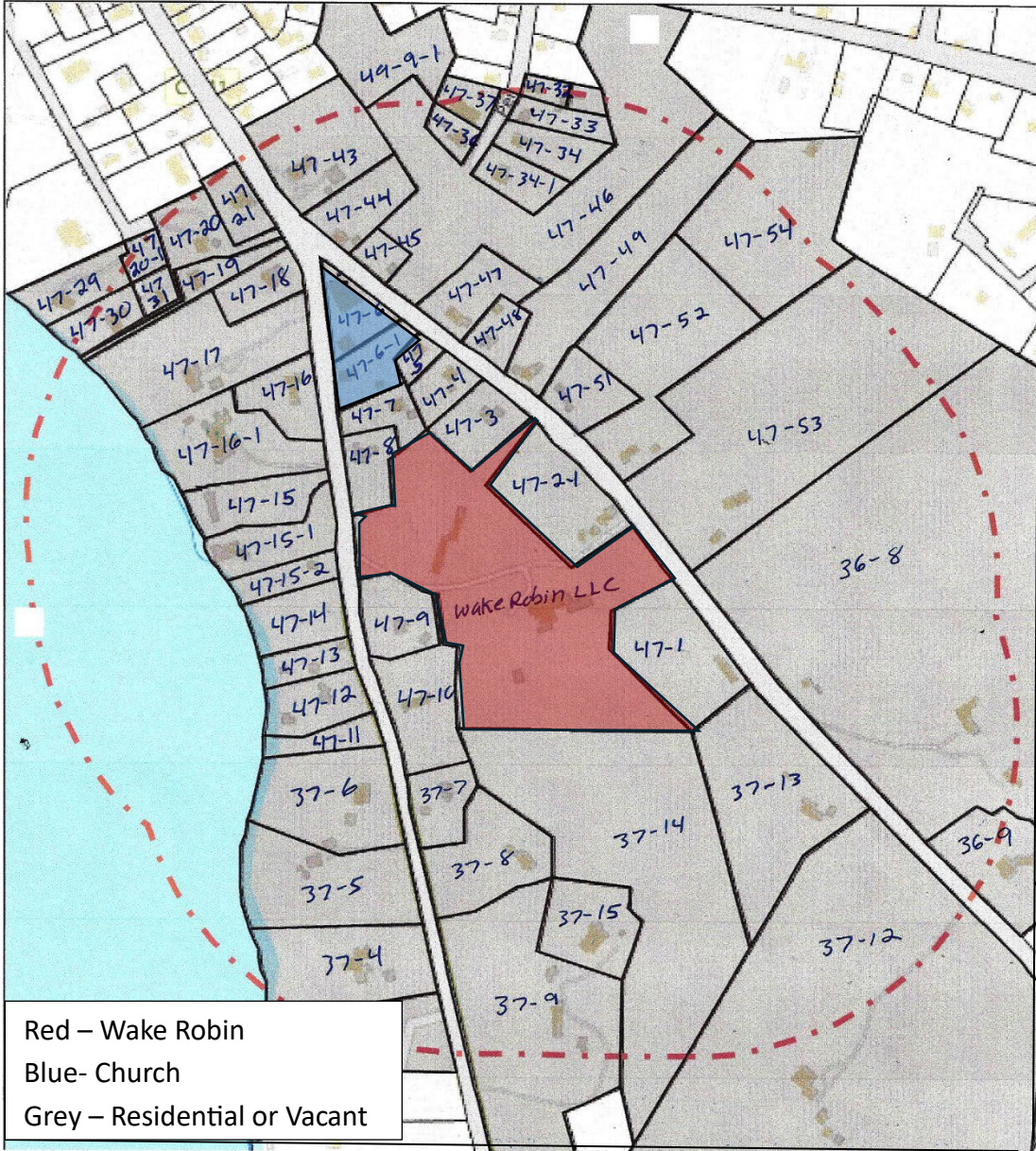
MN

This plan shows all abutters within 1000' of the property owned by Wake Robin LLC, with map and lot numbers noted. This map was generated using the Town of Salisbury GIS website

Mel A. Harder
17 Fyler Rd., Drawer N
East Hartland, CT 06027
phone/fax: (860) 653-2444



Date Printed: 10/14/2024



3. Zoning

The application form was filled out stating “Hotel” as the proposed development of the site. However, the plans and supplemental material include other significant uses that will expand into other separate business components.

The subject property is zoned RR-1, which according to Section 206.2 is classified as a “Single-Family Residential Zone,” and states:

The purpose of these zones, which encompass most of the geographic area of the Town, is to provide for residential housing, agricultural and other uses compatible with the rural residential – agricultural character of the Town and consistent with topographic, soil, wetland and water resource development limitations.

The application for the special permit was submitted in accordance with Section 213.5 of the Salisbury zoning regulations, which state:

213.5 Hotels in Residential Zones

Hotels are permitted in the RR-1 Zone subject to a special permit in accordance with Article VIII- Site Plans and Special Permits. The following additional standards and specific requirements apply.

- a. Minimum lot size shall be (10) ten acres.
- b. Frontage and Access. The property containing a hotel must have 150’ feet of frontage on and be accessed from a Connecticut state highway.
- c. Water and Sewer Service. The property must be served by public water and sewer.

The east side of the property is within the Aquifer Protection Overlay District.

Appendix - Definitions

The definition of ‘Hotel’ was recently amended to the following:

HOTEL. A facility offering transient lodging accommodations, which may include additional facilities and services, such as restaurants, banquet facilities, meeting rooms and event spaces, personal services, gift shops and convenience store, and recreational facilities.

Section 802 Special Permit Uses are an important determinant of the decision of the Planning and Zoning Commission. Section 802.1, shown below, requires that the applicant prove that the standards enumerated in subsections a., b., and c., are met, with the Commission specifically confirming that these requirements are met.

802.1 Purpose

Special Permit uses are a class of uses that have characteristics or a location that unless properly planned and designed could be detrimental to properties in the neighborhood, the zone or overlay district. Accordingly, this Article provides standards and requirements permitting the Commission to conduct a comprehensive review of the proposed Special Permit plan to:

- a. Assess the layout of the building(s), structure(s) or use(s) in relationship to the topographical and other natural features of the land, and of the impact of the use(s) upon the environment, health, safety, welfare, and convenience of the members of the community.
- b. Ensure that the design and layout of the site and the proposed use(s) will constitute suitable and appropriate development in character with the neighborhood and will not result in an unreasonable decrease in property values or a detriment to the present and potential use of the area in which it is located.
- c. Assure that proposed buildings, structures and uses will provide for the maintenance of air, surface-water, and groundwater quality and will not be detrimental to existing sources of potable water or other natural or historic resources.

803 Standards for Special Permits

When a Special Permit is required, the Commission shall apply the following standards in review of the application.

803.1 General

All buildings, structures and uses for which a Special Permit is required under these Regulations must meet the applicable standards set forth throughout these Regulations, including, but not limited to, the standards set forth in 801 Site Plan Review Standards. In addition, the following standards shall apply to Special Permit uses.

803.2 Relation of Buildings to Environment

The size and intensity, as well as the design, of the proposed project or development shall be related harmoniously to the terrain and to the use, scale, and sitting of existing buildings in the vicinity of the site. The use shall not create a nuisance to neighboring properties, whether by noise, air, or water pollution, offensive odors, dust, smoke, vibrations, lighting, or other effects.

803.3 Neighboring Properties

The proposed uses shall not unreasonably adversely affect the enjoyment, usefulness and value of properties in the general vicinity thereof or cause undue concentration of population or structures. In assessing the impact on surrounding properties the factors, the Commission shall consider include, but are not limited to, the existing and proposed pedestrian and vehicular circulation, parking and loading plans, storm water management systems, exterior lighting, landscaping, and signage.

The existing use of the property is non-conforming in respect to the RR-1 zoning. Although the application is for a special permit, its intended outcome would be an expansion of an existing non-conforming use, which is regulated through Sections 500.1, 500.2, 501.1, 503.1 and 503.2 of the zoning regulations.

500 Non-Conforming Situations – Definition and Intent

500.1 Definition

A non-conforming situation is a use, building, structure or lot which lawfully existed at the time of the adoption of these regulations, or any relevant amendment thereto, that does not conform to the requirements of these regulations or such an amendment. These non-conforming situations consist of the following:

NON-CONFOMING USE – A non-conforming use is a use of a lot, building or structure that does not meet the use requirements for the zone or overlay district in which it is located. A non-conforming use may be a non-conforming use of land and/or a non-conforming use of a building or structure.

500.2 Continuation of a Non-Conforming Use

As required by Connecticut General Statutes Section 8-2, these regulations do not prohibit the continuance of a non-conforming situation. With certain exceptions provided for this section, it is the intent of these regulations to reduce or eliminate non-conforming situations as quickly as possible.

501 Change of a Non-Conforming Use

501.1 The Commission may approve a change of a non-conforming use to another non-conforming use provided it finds the proposed non-conforming use will not have an adverse effect on the zone, the neighborhood or surrounding properties greater than the effect of the current non-conforming use. In making this determination ,the Commission shall consider the character, nature, purpose and scope of the activity on the property, such as traffic, noise, lighting and other external factors affect the zone, neighboring or surrounding properties.

503 Enlargement of a Non-Conforming use, Building or Structure.

503.1 No non-conforming use of land or non-conforming use of a building or a structure shall be extended to occupy a greater area, space or portion of such land, building or

structure than was occupied or manifesting arranged for the use on the date that its non-conforming status was established.

503.2 Except as provided, below, no non-conforming building or structure shall be altered, enlarged, or extended in any way that increases the area or space, including vertical enlargement, of that portion of the building or structures that is non-conforming. For the purpose of this regulon, vertical is defined as an enlargement or expansion either upward or downward.

In all zones, except the LA zone, subject to approval of a Special Permit, the Commission may approve second story additions or other vertical additions to the height or bulk of that portion of a residential building which is non-conforming in terms of minimum Yard Setback Requirements provided:

- a. The proposed addition is designed to be compatible with the existing building in terms of architecture, materials and appearance.
- b. The proposed addition does not project to the required minimum yard any further than the existing non-conforming building foundation or building façade.
- c. The Commission determines the application meets the General Standards for Site Plans and Special Permits, particularly sections 801.2, 801.3., 803.2 and 803.3.
- d. In evaluating the application and reaching its decision, the Commission shall take into consideration the degree of the existing non-conformity.

4. Plan of Conservation and Development

The Town is approaching the final steps of the completion of the 2024 Update of the Plan of Conservation and Development. Therefore, this plan was used for the analysis of this application.

The Plan focused on certain issues, such as affordable housing, agriculture, natural resources and development of the three village centers. The locations and boundaries of the three village centers are shown on a map within the draft Plan of Conservation and Development. (Page 31 and shown within Appendix A of this report.)

Regarding the subject property, the following points are most relevant:

- The plan clearly mapped the boundaries of the village centers where the development was to occur. The subject property was not within any of the village center development areas.
- One of the primary concerns was the “Ongoing environmental damage caused by development, forest clear cutting, and climate change...”(2024 Draft POCD Survey Priorities).

- There was no indication in the 2024 Plan of Conservation and Development of any recommendations for a change in the status of any the rural residential areas of Town.
- There were no recommendations within the 2024 POCD, to permit intensive commercial developments of any kind in the rural residential areas outside of the village areas.

5. Site Characteristics

The site includes two parcels: 104-106 Sharon Road and 53 Wells Hill Road. It is located in the southwestern part of the Town of Salisbury, and is approximately one-half miles south of Lakeville Center, and just east of Wononscopomuc Lake.

The total site encompasses 13.8 acres and is heavily wooded. It slopes down from a high point in the southern area 50' down to the low point near Sharon Road.

The site contains the following improvements:¹

53 Wells Hill Road

- Single-family home with 2,286 square feet of living area.
- Two outbuildings.
- Residential Driveway

104-106 Sharon Road

- Three story hotel building with 5,216 square feet of living area and 20 guest rooms.
- Garage – 800 square feet.
- Single-story seasonal motel building with 4,404 square feet and six guest rooms. .
- Paved and unpaved roadway areas

The property has frontage on both Wells Hill Road and Sharon Road, also known as State Route 41. It runs along the east shore of Wononscopomuc Lake, towards the Town of Sharon to the south. Wells Hill Road is a town road which intersects Sharon Road one-half mile north and goes toward the Lime Rock area of Town.

The current site facilities include a 20-room hotel, and an additional six rooms in the motel area.² The existing website also indicated that the property was available for outdoor weddings and retreats. It has been advertised as providing short stay rooms for parents and others visiting the Hotchkiss School, Salisbury School, Berkshire School, Maplewood School and Kildonan School, as well as visitors to Lime Rock raceway.

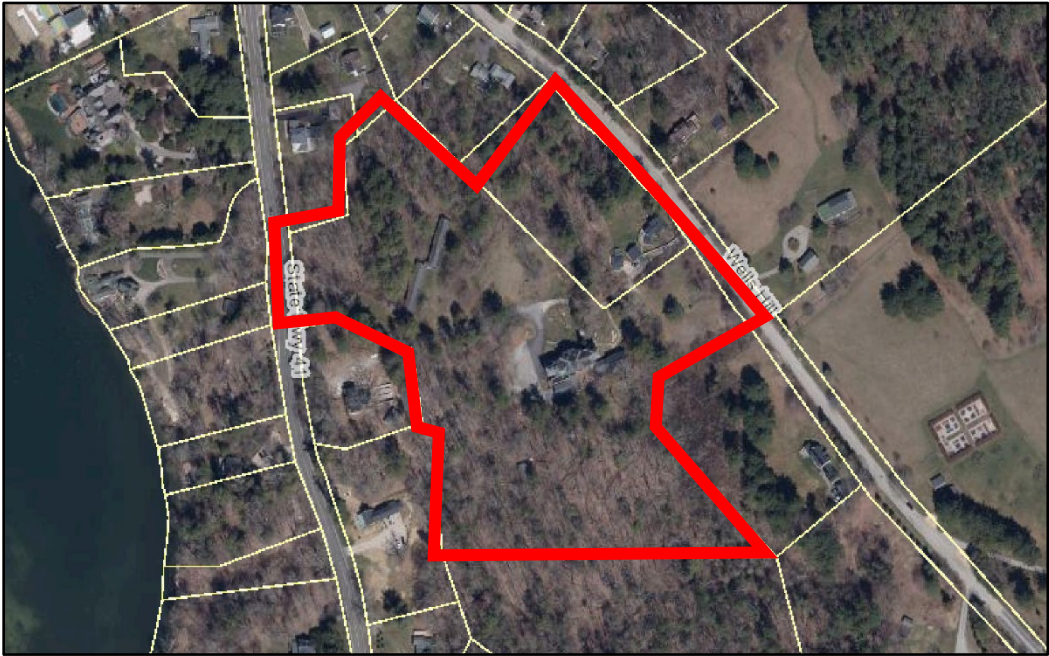
¹ Source: Assessors Office, Town of Salisbury

² <https://www.wakerobinn.com/>

The website indicates that at the time it was used, there were no restaurants or other eating facilities. The website recommended several nearby restaurants to the guests.

The occasional wedding was seasonal, and there was a maximum of 26 rooms being occupied. That, along with the occasional event, was the maximum level of activity at the site.

The nighttime activity has been very low-key, mostly limited to hotel guests driving back to their rooms. Therefore, The net impact upon the neighborhood surrounding residences has been minimal due to the size , scale, timing and types of the activities.



Subject Property

6. Proposed Development

According to the Statement of Purpose, which is part of the application, the proposal includes a complete redevelopment of the site, turning it into a “boutique hospitality campus that will serve both the local Salisbury and greater areas.”

The application plan includes the following components.

Event Barn + Fast Casual Restaurant

- Most Events Friday & Saturday could be other days.
- 4PM to Midnight
- Capacity 200 people
- Fast Casual Restaurant (outdoors) 30-40 people anticipated.
- Usable space: 4,434 sq ft

Restaurant – Bar

- Restaurant three meals/day 7:30 AM to 11 PM
- Bar open from 11:00 AM to Midnight.
- Outdoor activities until 9:00PM
- Usable Space 2,734 sq ft
- Anticipated usage of 40-80 people inside and 40-80 people outside; No maximum capacity indicated.

Spa-Gym

- Useable space 1,018
- 7:AM to 7:PM

Pool

Twelve new Guest Cottages containing one or two bedrooms and renovation of existing cottage

Renovations and Expansion of existing inn

<u>Total Employees</u>		82-99
<u>Total Rooms for Guests</u>		69-71
<u>Building Totals</u>	Above Ground	63,057 sq. ft
	Basement	12,249 sq. ft.
	Total Buildings	75,306 sq. ft

7. Findings

7.1 Comparison of Existing Conditions and Proposed Development

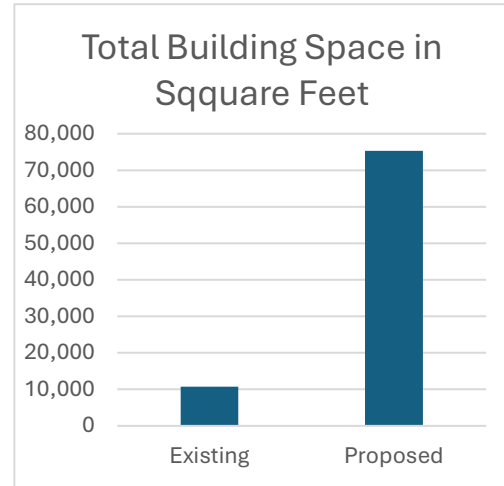
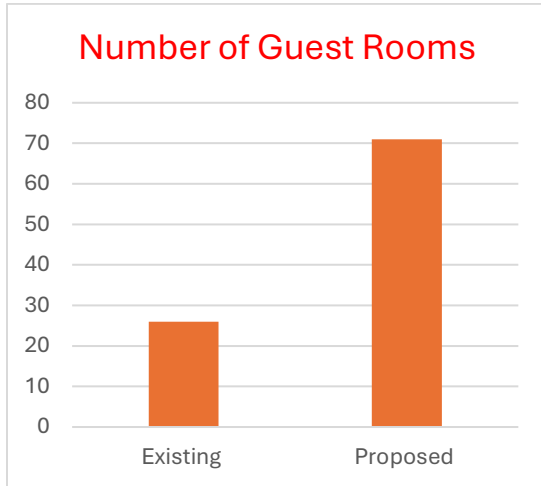
The proposal would be a much larger and busier use of the property than past use.



The magnitude of the proposal is shown on the two plans illustrated above. The top map compares the extent of existing disturbed areas on the top, with that of the proposed plan, on the bottom. The proposed plan indicates that the disturbed, developed areas would encompass almost the entire parcel, right up to the property boundaries.

Table -Comparison of Existing Situation and Proposed Development

	Existing	Proposed	Difference	% Increase
Guest Rooms	26	69-71	+45	+173%
Total Building space	10,714 sf	75,306 sf	+64,592	+603%



The chart and graphs above also illustrate the proposed changes for the site. The number of guest rooms will almost triple, and the building area by seven-fold.

7.2 Mixed Use Development not Permitted by Zoning

This application is for a mixed-use development. Mixed-use developments typically have several distinct uses which have a symbiotic relationship. They may be under common ownership, or they may be separate businesses. Some uses may be subordinate, but each of the individual uses can operate separately and benefit from each other.

The barn, spa and restaurant can operate independent of each other and the hotel. Neither of them is permitted in the RR- zone. Although there is that symbiotic relationship, they are not a part of the hotel. A hotel, with a dining area, a bar and small meeting rooms in the same building could be permitted, but the application goes way beyond that.

The intent of the zone clearly indicates that it does not permit large-scale commercial developments, as stated in Section 206.2 of the zoning regulations and shown below:

The purpose of these zones, which encompass most of the geographic area of the Town, is to provide for residential housing, agricultural and other uses compatible with the rural residential – agricultural character of the Town and consistent with topographic, soil, wetland

and water resource development limitations. The RR-1-V zone is a transition area between small lot village residential zones (R-10 and R-20) and larger lot rural residential zones (RR-1 and RR-3) where public water and sewer service may permit housing clusters designed to maintain open space entryways to the village centers.

The proposed hotel would not be in conformance with the intent of the zoning regulations. The traditional use of the property has been for 26 units and could be considered a “quaint country inn”. The proposal would increase the number of rooms to 71, an increase of 173%.

7.3 Impact of Individual Uses

Each of the proposed uses and facilities are cause for concern about potential impacts.

a. Event Barn – Fast Casual Restaurants

- Maximum capacity is 200 people which is a large crowd of people. Guests at parties or celebrations tend to be noisy, especially when alcohol is available.
- The original hours of operation, as stated in the application, were 2AM on weekends and midnight during the week. The applicant revised the hours of operation in the letter of October 10, 2024, to midnight on weekends and 10 PM during the week. This is slightly better than the original proposal, but it will still be disruptive to the neighbors.
- The term “Special Events” can be encompassing, and not limited to events like weddings, so it is possible that there may be several special events per week.
- The applicant in Section 5 of the letter from Attorney Mackey described some management issues to address the noise, hours of operation, alcohol and traffic. Although well intentioned, the proposed measures indicated would be the expected norm in any well managed facility, and not eliminate the anticipated impacts, such as the indicated staff performing their job, in a competent manner such as alcohol control, noise control, etc. It was surprising to learn that the execution of a contract and cameras for all necessary areas was not part of the original intent.

b. Restaurant Bar

- The issues discussed above are relevant to the proposed restaurant bar as well.

c. Pool

- The response letter refused to eliminate the music at the pool.

d. Enforcement

- Zoning control of these potential problems is difficult and reactive, and not effective control in this situation.

7.4 Affordable Housing

The town of Salisbury has been confronting the issue of affordable housing for the past several years. There are many factors but an important one expressed is the impact on local businesses. Many of the service businesses within the town have trouble attracting employees due to the lack of affordable housing.

The proposed development would employ up to 99 employees, according to the application materials. The wages of hospitality and restaurant employees are generally low. It raises the issue as to where these employees would live. This is likely to worsen the affordable housing situation, doing nothing to assist in a solution.

7.5 Traffic Impact

The applicant submitted a traffic impact analysis. The emphasis of the study was to evaluate the functionality of specific intersections in the vicinity of the proposed project. This is normal practice in these situations. However, it does not measure the impact of increased traffic on the quality of life of residential neighborhoods.

The primary concern is safety, which includes pedestrian and bicycle safety as well as that of automobiles. Both roads serving this development are narrow, two-laned roads, with small or non-existent shoulders. Neighborhood residents enjoy walking, jogging and cycling along the roads.

The proposed development will significantly increase traffic. Quite simply, an increase in traffic reduces the actual and perceived safety of the residents. The multiple uses of streets and roads has become a specific policy of the State of Connecticut through its "Complete Streets" program, which recognizes and encourages non-vehicular traffic, walking, and biking. The program is described in Appendix B of this report.

The Traffic Impact Report, submitted by Hesketh Associates, indicates that the sightlines of the Sharon Road entrance to the north do not meet the standards of the Department of Transportation. No significant congestion was anticipated in the report. However, traffic impact reports seldom consider the impact of the increased traffic on the rural quality of life of the surrounding areas. The noise, speed, and limitations imposed upon using the roads for walking, jogging, and biking are not normally evaluated. These factors will be evident with the development of this proposal and detract from the residents' quality of life.

7.6 Pedestrian Transportation

The Hotchkiss School is one mile south of the Sharon Road entrance to the property. The students enjoy walking into Lakeville along Sharon Road, often by necessity, within the traffic lanes. A new ice-cream parlor is opening in Lakeville, which is likely to increase the Hotchkiss pedestrian trips into Lakeville.

The increase in traffic will increase the level of danger for the pedestrian students. There has been discussion about the installation of a sidewalk along Route 41 from Hotchkiss School to Lakeville Center. The developer expressed “support” for this project. However, the funding of the sidewalk is not within the transportation improvement agenda of the most recent Regional Transportation Plan of the Northwest Hills Council of Governments and there has been no commitment by the Town or the applicant to fund this project.

7.7 Sanitary Sewer

The Draft 2024 POCD Sustainable Salisbury summarized relevant studies done on the sanitary sewer system. The finding that “the Town’s existing sewer facilities are in relatively good operating condition...”³

“Proposed developments and changes in residential use patterns could easily overwhelm the existing capacity of the sewage treatment plant. Most recent estimates indicate, after the completion of Sarum Village III, the remaining sewer reserve capacity is around 200 bedrooms. Historical sewer usage data cannot be relied upon as a foundation for future planning. For instance, the possibility of increasing year-round use of existing residences should be considered, as well as the potential for infill development and/or expansion within the villages.”⁴

The proposed development, with the restaurant, “barn,” spa, pool and 71 guest rooms will increase the sewage flows tremendously. It is uncertain that the capacity to serve the proposed development is available. (See Appendix C, “Proposed Wake Robin Inn Redevelopment – Sewer Gallons per Day Calculation, September 27, 2024.) Even if it is determined that the system could currently accommodate this proposed development, it will utilize much of the available capacity which may be available for other, higher priority needs, as described in the above paragraph of the Draft POCD.

The approval of this application may prevent or impede other community developments more beneficial to the Town by reduction of potential sewer capacity. This requires a complete analysis

³ Page 60 of Draft 2024 POCD Sustainable Salisbury

⁴ Page 60 of Draft 2024 POCD Sustainable Salisbury

and plan, produced jointly by the Planning and Zoning Commission and the Water Pollution Control Authority.

7.8 Commercial Sprawl

As previously described, this proposal would convert a small, low impact business into an intensive commercial hospitality and entertainment destination, with no positive relationship with the surrounding users. This proposed commercial center will be surrounded by the existing single-family houses.

From a personal perspective, in my 40 years of experience, I cannot recall any community in recent years permitting the establishment of a new commercial center in a similar rural area surrounded by single-family homes.

The border or interface between commercial and residential uses is always subject to potential adverse impacts on the residential sector, due to noise, traffic, safety, lighting and activity. Many communities are faced with the inherent problems of adjacent commercial and residential uses, but these situations are usually a result of long-time existing development and/ or zoning patterns. It is highly unusual for a town to voluntarily create a new potentially difficult situation.

Although the term is not commonly used now, this proposal could be thought of as “spot zoning.”

- a. This would be contrary to long-held community planning practices. It is inconsistent with the Town’s Draft POCD, which calls for commercial development within the Town’s designated village areas. (See POCD map in Appendix A). This proposed commercial use is not within the limits of the Lakeville village area. The process of the formulation of the POCD had the recent opportunity to include a recommendation for this type of development. Instead, they determined that the existing development patterns of the rural residential area should not be changed.
- b. The approval of this application may also start a precedent to encourage or permit new freestanding hospitality – entertainment centers at other locations throughout the community.
- c. It is hard to understand why the Planning and Zoning Commission would deviate from a POCD with a final draft, in the process of approval.

7.9 Parking

The original site plan shows a total of 160 parking spaces, which includes the 39 overflow spaces on the lawn.

The applicant submitted a "Parking and Occupational Analysis," which examined the parking needs of different use and season scenarios, based upon the number of guests. Their analysis included assumptions related to the percentage of the users of the spa, restaurant and barn as hotel guests. They assumed 2.5 guests per car, which seems optimistic and undercounts the need for parking. An assumption of 2.0 guests per car would be more realistic. In addition, the analysis included projected capture rates, which have been subjectively applied.

These assumptions may be valid or close enough for most situations. However, the scenarios during the peak seasons were close to 160 spaces, leaving little room for error.

7.10 Environmental Factors

The proposed development will require the clear cutting of most of the site, leaving out only the fringes of the property. It will also require much of the site to be regraded with a projected 269 cubic yards of material from the site.

The construction activities necessary for this development will also have environmental impacts as well as creating noise, dust, truck traffic and other nuisance impacts inherent in the construction of large projects such as this.

The Commission has received several comments by neighbors discussing the potential environmental impacts of this project, consideration by the Planning and Zoning Commission.

8. Conclusion

This project is not in conformance with the Plan of Conservation and Development nor the Salisbury Zoning Regulations, for all the reasons stated above within Section 7, Findings.

More specifically, the application does not meet the following sections of the Zoning Regulations, with particularly relevant sections highlighted. :

802.1 Purpose

b. Ensure that the design and layout of the site and the proposed use(s) will constitute suitable and appropriate development in character with the neighborhood and will not result in an unreasonable decrease in property values or a detriment to the present and potential use of the area in which it is to be located.

803 Standards for Special Permits

803.2 Relation of Buildings to Environment

The size and intensity, as well as the design, of the proposed project or development shall be related harmoniously to the terrain and to the use, scale, and siting of existing buildings in the vicinity of the site. The use shall not create a nuisance to neighboring properties, whether by noise, air, or water pollution, offensive odors, dust, smoke, vibrations, lighting, or other effects.

803.3 Neighboring Properties

The proposed uses shall not unreasonably adversely affect the enjoyment, usefulness and value of properties in the general vicinity thereof or cause undue concentration of population or structures. In assessing the impact on surrounding properties the factors the Commission shall consider include, but are not limited to, the existing and proposed pedestrian and vehicular circulation, parking and loading plans, storm water management systems, exterior lighting, landscaping, and signage.

206.2 Single Family Residential Zones (RR-1-V, RR-1, RR-3)

The purpose of these zones, which encompass most of the geographic area of the Town, is to provide for residential housing, agricultural and other uses compatible with the rural residential – agricultural character of the Town and consistent with topographic, soil, wetland and water resource development limitations. The RR-1-V zone is a transition area between small lot village residential zones (R-10 and R-20) and larger lot rural residential zones (RR-1 and RR-3) where public water and sewer service may permit housing clusters designed to maintain open space entryways to the village centers.

500.1 Definition

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As required by Connecticut General Statutes Section 8-2, these regulations do not prohibit the continuance of a non-conforming situation. With certain exceptions provided for this section, it is the intent of these regulations to reduce or eliminate non-conforming situations as quickly as possible.

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503.2 Except as provided, below, no non-conforming building or structure shall be altered, enlarged, or extended in any way that increases the area or space, including vertical enlargement, of that portion of the building or structures that is non-conforming. For the purpose of this regulation, vertical is defined as an enlargement or expansion either upward or downward.

In all zones, except the LA zone, subject to approval of a Special Permit, the Commission may approve second story additions or other vertical additions to the height or bulk of that portion of a residential building which is non-conforming in terms of minimum Yard Setback Requirements provided:

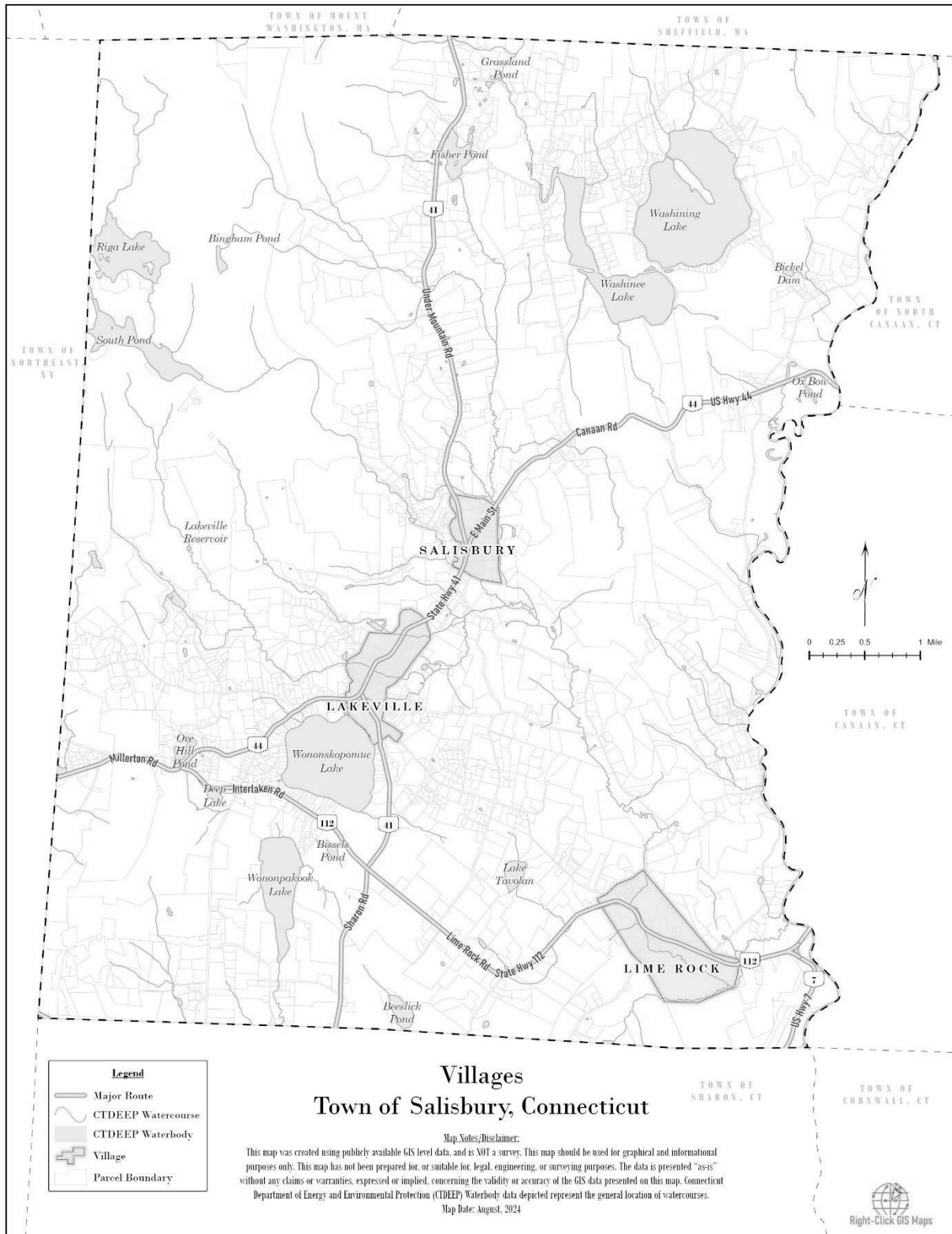
- e. The proposed addition is designed to be compatible with the existing building in terms of architecture, materials and appearance.
- f. The proposed addition does not project to the required minimum yard any further than the existing non-conforming building foundation or building façade.
- g. The Commission determines the application meets the General Standards for Site Plans and Special Permits, particularly sections 801.2, 801.3., 803.2 and 803.3.
- h. In evaluating the application and reaching its decision, the Commission shall take into consideration the degree of the existing non-conformity.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian J Miller". The signature is fluid and cursive, with the first name "Brian" being more prominent than the last name "Miller".

Brian J Miller, AICP

Miller Planning Group
Wallingford, Connecticut
203-314-7151
bmiller@millerplanninggroup.com



Appendix B

Bicycles, Pedestrians and Complete Streets

The Connecticut Department of Transportation (CTDOT) is committed to the principle that walking and bicycling promote healthy lives, strong communities, and more sustainable environments. CTDOT will encourage, promote, and improve walking, bicycling, and other forms of active transportation, so that any person, regardless of age, ability, or income will be able to walk, bicycle, or use other types of active transportation modes safely and conveniently throughout Connecticut. The CTDOT is working towards creating an integrated network of on-road facilities and multi-use trails that will connect key destinations, municipalities, and regions, while strengthening Connecticut's links to neighboring states. This page is a central location for links to transportation initiatives, design tools, and other helpful information.

Proposed Wake Robin Inn Redevelopment – Sewer Gallons per Day Calculations
Special Permit Application #2024-0257
September 27, 2024

RECEIVED
NOV 15 2024

BY: P.H. Frines

The below numbers were obtained from the Connecticut Public Health Code On-site Sewage Disposal Regulations and Technical Standards for Subsurface Sewage Disposal Systems and are based on the sanitary discharge rates found in Section IV, Table 4.

Building / Use	Gallons Per Day <i>Assumes operation at 100% occupancy</i>	Maximum Annual Usage <i>Assumes operation at 100% all 365 days of the calendar year</i>	Anticipated Annual Usage	Notes
Main Hotel + Extension				
Restaurant + Bar	6,600	2,409,000	1,372,800	Open 320 days a year at 65% occupancy
Existing Guest Rooms	1,800	657,000	361,350	Open 365 days a year at 55% occupancy
Additional Guest Rooms	3,900	1,423,500	782,925	Open 365 days a year at 55% occupancy
Laundry Facilities	1,600	584,000	584,000	Open 365 days a year at 100% occupancy
Spa	500	182,500	140,000	Open 350 days a year at 80% occupancy
Event Barn + Fast Casual				
Event Barn	625	228,125	22,500	Assuming 3 events per month = 36 events
Event Barn (banquet)	3,750	1,368,750	97,500	Assuming 1 event every other weekend = 26 events
Fast Casual Restaurant	500	182,500	146,000	Open 365 days a year at 80% capacity
Pool + Pool House	1,000	365,000	150,000	Open for 5 months of the year = 150 days at 100% occupancy
Cottages	1,800	657,000	361,350	Open 365 days a year at 55% occupancy
TOTAL	22,075	8,057,375	4,018,425	

The "Gallons Per Day" above (22,075) and its reflective "Maximum Annual Usage" (8,057,375) assume that all spaces are 100% occupied all 365 days of the year which will never be the case. The "Anticipated Annual Usage" accounts for the projected occupancy and programming of the facility.

Restaurant:

120 Seats
 30 Gallons per seat
 3 Meals per day
 Calculation (120 Seats X 30 Gallons per seat X 1.5 meals) = 5,400 GPD

Bar:

40 seats
 30 Gallons per seat
 Calculation (40 Seats X 30 Gallons per seat) = 1,200 GPD

Existing Guestrooms:

18 Guestrooms (18 Bedrooms)
 100 Gallons per room
 Calculation (18 Bedrooms X 100 Gallons per room) = 1,800 GPD

Additional Guestrooms:

39 Guestrooms
 100 Gallons per room
 39 Bedrooms
 Calculation (39 Bedrooms X 100 Gallons per room) = 3,900 GPD

Laundry Facilities:

4 Washing Machines
 400 Gallons per machine
 Calculation (4 Machines X 400 Gallons per machine) = 1,600 GPD

Spa:

50 persons per day

10 Gallons per person

Calculation (50 People X 10 Gallons per person) = 500 GPD

Event Barn (social event):

125 People

5 Gallons per person

Calculation (125 People X 5 Gallons per person) = 625 GPD

Event Barn (banquet):

125 People

30 Gallons per person

Calculation (125 People X 30 Gallons per person) = 3,750 GPD

Fast Casual Restaurant:

100 Meals per day

5 Gallons per meal

Calculation (100 Meals X 5 Gallons per day) = 500 GPD

Pool + Pool House:

100 Bathers

10 Gallons per bather

Calculation (100 Bathers per day X 10 Gallons per bather) = 1,000 GPD

Cottages:

14 Rooms accounting for 18 Bedrooms

100 Gallons per bedroom

Calculation (18 Bedrooms X 100 Gallons per bedroom) = 1,800 GPD

Appendix B

“Current vs. Maximum Amount of Building and Landscaping – Zoning Table”
attachment to letter from Attorney Joshua Mackey to Salisbury Planning and Zoning
Commission; August 12, 2025.

Current vs. Proposed vs. Maximum Allowable Building & Landscaping - Zoning Table

#2025 – 0287: Wake Robin Inn Redevelopment

8/12/2025

	Current Properties	Original Application (Aug 2024)	Withdrawn Application (Dec 2024)	NEW Application (Apr 2025)	Maximum Allowed Per Current Zoning Regulations	Notes
Number of Guestrooms	40	57	53	53	86	Used the same ratio as "New Application"
Number of Cottages	2	14	12	4	7	Used the same ratio as "New Application"
Total Keys (total hotel rooms)	42	71	65	57	93	Used the same ratio as "New Application"
Total Buildings Square Footage (sf)	36,065 sf	75,306 sf	74,294 sf	67,950 sf	240,352 sf	Assumed all structures are 4 floors at maximum 35' building height
Maximum Occupancy (guestrooms)	106	246	212	166	271	Used the same ratio as "New Application"
Anticipated Occupancy	106	186	158	130	212	Used the same ratio as "New Application"
Peak Traffic Count (# of cars) <i>With Event / No Event</i>	150 / 175	171 / 197	171 / 197	150 / 175	225/200	Estimate
Event Space Square Footage (sf)	1,500 sf	12,029 sf	5,712 sf	5,430 sf	9,013 sf	Current (sf) does not include outdoor tented events square footage
Building Coverage (sf)	24,490 sf	45,667 sf	40,859 sf	36,653 sf	60,088 sf	"New Application" is 40% below the maximum allowed
Building Coverage (% of total lot)	4.10%	7.60%	6.80%	6.10%	10.00%	"New Application" is 40% below the maximum allowed
Landscaping & Vegetation	Invasives present; No landscaping plan	Invasive Removal & Landscaping Plan Proposed	Invasive Removal & Landscaping Plan Proposed	Invasive Removal & Landscaping Plan Proposed	Not Required	New Application includes removal of invasive species (trees, shrubs & vines) and proposed detailed property restoration landscaping plan (native plant material) to promote naturalized landscaping and visual screening from neighboring properties

Appendix C Noise

Section 22a-73 Connecticut General Statutes

Sec. 22a-73. Municipal noise regulation programs; ordinances subject to commissioner's approval. (a) To carry out and effectuate the purposes and policies of this chapter it is the public policy of the state to encourage municipal participation by means of regulation of activities causing noise pollution within the territorial limits of the various municipalities. To that end, any municipality may develop and establish a comprehensive program of noise regulation. Such program may include a study of the noise problems resulting from uses and activities within its jurisdiction and its development and adoption of a noise control ordinance.

(b) Any municipality may adopt, amend and enforce a noise control ordinance which may include the following: (1) Noise levels which will not be exceeded in specified zones or other designated areas; (2) designation of a noise control officer and the designation of an existing board or commission, or the establishment of a new board or commission to direct such program; (3) implementation procedures of such program and the relation of such program to other plans within the jurisdiction of the municipality; (4) procedures for assuring compliance with state and federal noise regulations; (5) noise level restrictions applicable to construction activities, including limitation on on-site hours of operation.

(c) Any such municipal noise control ordinance shall be at least as stringent as any state noise control plan, including ambient noise standards, adopted pursuant to section [22a-69](#) or any standards or regulations adopted by the administrator of the United States Environmental Protection Agency pursuant to the Noise Control Act of 1972 (P.L. 92-574) or any amendment thereto. Notwithstanding the provisions of this subsection, any municipality may adopt more stringent noise standards than those adopted by the commissioner.

Appendix D

Statement of Qualifications

Brian J. Miller, AICP - Principle

The Miller Planning Group

RESUME

Principle TMPG, LLC

Previous Experience

- Director of Development Services, Town of Berlin
- Comprehensive Planner, City of Longmont, CT
- Consulting Planner, West Haven, Tolland, Oxford, Middlebury, Hamden, Beacon Falls, Orange

Consulting Assignments

- Economic Development Strategies
- Land Use Strategies
- Development Permitting
- Municipal Planning
- Community Revitalization

Education

- BA Economics, University at Albany
- Masters Urban Planning University of Illinois

Other Positions

- Cheshire Economic Development Com.
- Connecticut Blue Ribbon Commission on Affordable Housing 1999
- Cochairman of Legislative Committee of CT Chapter American Planning Association

Brian Miller has over 40 years of planning experience throughout the tri-state area, but particularly in the State of Connecticut. He is the president and owner of The Miller Planning Group, LLC.

Brian has served as the staff planner a range of Connecticut communities, including West Haven, Milford, Woodbury, Beacon Falls, Middlebury, Stafford, Oxford, and Orange. He has extensive experience with the preparation of Plans of Conservation and Development for numerous Connecticut municipalities such as Beacon Falls, North Branford, Groton, Tolland, Oxford, West Haven and Marlborough. He recently completed the Plan for East Haven and has worked on Comprehensive Plans for Poughkeepsie in New York as well as the Boroughs of Little Falls and North Haledon in New Jersey.

Economic development has been a component of municipal planning. He has worked with the Connecticut Economic Resource Center (CERC) as an Economic Development Consultant, Brian assisted and coordinated the statewide municipal economic development efforts. There he also part of a team which formulated an action strategy for revitalization of downtown Willimantic, a business retention strategy for the City of Meriden, and a Municipal Economic Strategy for Tolland, Connecticut. A recent assignment has been the update of the East Have Plan of Conservation and Development, with an emphasis on economic development in certain important areas of the Town. His experience includes drafting revisions to Zoning Regulations for communities throughout Connecticut,

There have also been many assignments for private sector clients. This includes market analysis, fiscal impact analysis, neighborhood impact analysis, design and preparation of applications for zoning amendments. He has also worked on plans for areas and neighborhoods, such as a study for the Town of Orange for the Edison Road – Marsh Hill Road area, re-use of the Baltic Mill property in Sprague, downtown Beacon Falls, Plainville and Willimantic and the Blue Hill Avenue Corridor of Hartford.

Recent assignments have included working with the Affordable Appeals Act applications, both on the behalf of developers as well as the municipalities experiencing these potential developments.

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The Miller Planning Group
Land Use Solutions

FIRM DESCRIPTION

The Miller Planning Group (MPG) is a land use, economic development and community planning firm with an office in Wallingford, Connecticut. Our roots in land use planning go back forty years and include a broad range of land use and development issues.

Our practice includes governmental and private clients throughout the northeast, working with developers, attorneys, cities, towns, on a wide range of planning issues. We accomplish the objectives of our clients through comprehensive analyses, based upon our experience in “real world” situations. MPG works with a network of other professionals, to provide a full range of services to our clients.

For private sector clients, MPG offers planning and development services from project inception to project approval. Our services include land planning and site feasibility studies, housing analysis, community and fiscal impact analyses, zoning analysis, market analysis and feasibility studies, and economic development. A keen understanding of the public sector allows MPG to assist developers obtain the approvals necessary to complete their residential, industrial and commercial projects in a timely fashion.

For the public sector, MPG provides comprehensive planning, zoning ordinance revision and preparation; redevelopment, housing and community development; affordable housing planning and implementation; site and subdivision plan review; economic development and revitalization. The firm has been retained by municipalities and public agencies to provide planning expertise on specific projects as well as on a continual basis. Our public clients have range from small rural communities to established urban centers.

MPG and its associates are aware of the sometimes-conflicting goals between various interests. The firm’s extensive experience operating on each side of the review table gives us the ability to provide insightful solutions helping to bring these conflicting goals in harmony with one another. We utilize this perspective on behalf of our clients within the planning and development processes, expediting the process to save money, time and effort for all interests, achieving solutions that are in the public interest.