

GREGORY AND ADAMS, P.C.

ATTORNEYS AT LAW
190 OLD RIDGEFIELD ROAD
WILTON, CT 06897

ESTABLISHED 1964

JULIAN A. GREGORY
(1912 - 2002)

THOMAS T. ADAMS
(1929 - 2015)

PAUL H. BURNHAM
SUSAN L. GOLDMAN
J. VANCE HANCOCK
J. CASEY HEALY
DERREL M. MASON*
MATTHEW C. MASON*
JAMES D'ALTON MURPHY*
RALPH E. SLATER
ROGER R. VALKENBURGH *

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(203) 762-9000 FAX: (203) 834-1628
WWW.GREGORYANDADAMS.COM

PLEASE REPLY TO SENDER:
JAMES D'ALTON MURPHY
DIRECT DIAL: 203-571-6309
jmurphy@gregoryandadams.com

* ALSO ADMITTED IN NEW YORK
* ALSO ADMITTED IN VERMONT

June 4, 2021

By E-mail and Hand Delivery

Planning and Zoning Commission

Town Hall Annex

238 Danbury Road

Wilton, CT 06897

Attn: Mr. Michael E. Wrinn – Director of Planning and Land Use Management

Re: Four Seasons Racquet Club, LLC and Northeast Volleyball Club, LLC –
Application for Planning and Zoning Informal Review
Premises: 589 Danbury Road, Wilton, Connecticut

Dear Mr. Chairman and Members of the Commission:

This firm represents Four Seasons Racquet Club, LLC (Four Seasons) and also Northeast Volleyball Club, LLC (NEVBC), two athletic clubs which jointly make use of the property at 589 Danbury Road (the Property). Four Seasons is owned and operated by Greg Moran. NEVBC is owned and operated by Cat Dailey Minyard and Garrett Minyard.

The Property is currently 6.1 acres, and it houses 73,000 ft.² of indoor tennis courts (9 courts) as well as 12 outdoor courts, a swimming pool, a spectator building, a parking lot, and other site improvements. Four Seasons currently leases two of its indoor tennis courts to NEVBC; two tennis courts allow the placement of three volleyball courts.

NEVBC is pursuing the design, approval and construction of a new six-court volleyball building on the northern portion of the site where there are currently a number of outdoor tennis courts.

Both tennis and volleyball are played year-round and therefore indoor courts are needed. In addition, both sports require very large quantities of square footage/footprint and also very large quantities of cubic footage to achieve high ceiling heights without interior columns as structural supports.

Indoor tennis and indoor volleyball buildings are very large by necessity. A volleyball court with surrounding player space outside the lines consumes 4,000 ft.²; a tennis court similarly consumes 7,000 ft.². With six players on each volleyball team 4,000 ft.² of court space is required to accommodate 12 players. Stated differently, for each volleyball player 333 ft.² of court space is required which is equivalent to a room 12' x 27.7' per player. The per player square footage consumption of tennis is even greater; a tennis court with player space outside the lines requires 7,000 ft.²; a doubles game involving only four people nonetheless requires 1,750 ft.² of building per player (equivalent to a six-car garage).

It is the combination of the significant commitment of footprint square footage and cubic square footage which drives the design and large size of the existing tennis buildings and proposed volleyball building. Due to the need for large amounts of very valuable land to accommodate large buildings, both the tennis and volleyball organizations also must achieve a minimum critical mass to be viable. Four Seasons and NEVBC have analyzed this question carefully and determined that a mix of 9 indoor and 6 outdoor tennis courts along with 6 indoor volleyball courts will be an appropriate mix to allow the two organizations to continue to offer year-round tennis and volleyball to the Wilton and regional communities.

At the upcoming public hearing the applicants will give testimony and provide evidence as to the significant benefit which will accrue to Wilton and neighboring communities from the full operation of the Northeast Volleyball Club in a new six-court building. A few of those benefits are:

1. Provides K through 12 year-round athletics for hundreds of children and teens.
2. NEVBC complements the Wilton schools' athletic programs; hours and seasons do not coincide.
3. Creates a center of wellness and activity for student athletes from Wilton and surrounding towns.
4. Enhances a strong tradition of Wilton athletics.
5. Creates a place to study and do homework or just be with friends before or after practices and games.
6. Teaches time management.
7. Instills self-confidence, self-esteem and therefore happiness.
8. Maintains basic fitness and builds strength and endurance.
9. Enhances the college application prospects for dozens of young people each year.

June 3rd ARB Informal Review Meeting: The building and site design package submitted with this letter (enclosures 6 and 7) were also reviewed at an informal hearing held by the Architectural Review Board (ARB) on the evening of June 3rd. We do not yet have a copy of the ARB minutes but in summary, the ARB members were unanimously supportive and complimentary of the design and site placement details.

Current and possible future benefits of adjacent state-owned land; front yard and rear yard: The site enjoys the unique benefit of having a triangular piece of state-owned land between the proposed building and the actual traveled way of Route 7. In addition, to the rear of the property is a minimum 300-foot-wide swath of state-owned land which is in reserve for the future construction, if ever, of Super

7. These two somewhat unique benefits are illustrated on the CT DOT inquiry exhibits which are enclosures 3, 4 and 5 to this letter.

Four Seasons has asked to purchase the triangular piece of land along the Route 7 frontage and is somewhat optimistic that the purchase will be approved, although a decision is many months away. Four Seasons has also asked for a lease of some of the state land to the rear which would be used only for improvements such as overflow tournaments parking. Any leasehold improvements would have to be easily removed on 30 days' notice if the state ever proceeded with the construction of Super 7.

Whether the purchase of the triangle in the front yard or the lease of some of the 300-foot-wide wooded corridor in the rear come to fruition, nonetheless both parcels provide a current and very unique benefit to this property. It is extremely unlikely that the State would relocate a dog leg in Route 7 traveling through the triangle since the triangle itself results from the straightening of Route 7 years ago. Therefore, the apparent, *de facto* front yard setback is quite large. Similarly, if the State ever decided to construct Super 7, the presence of the (admittedly large) volleyball building will still have no effect whatsoever on the residences to the west because the highway itself will continue to provide a very wide buffer as is currently the case with the wooded buffer.

Compliance with Bulk Zoning Regulations: Ultimately, Four Seasons and NEVBC will be requesting some relief from the existing bulk regulations applicable in the GB zone. That relief will be framed in terms of a request for a text amendment contemplating more favorable treatment on the questions of front and rear yard setbacks, floor area ratio and building coverage. The request will be based upon the intrinsic requirements for a very large tennis and a very large volleyball building combined with the unique location of this property such that adjacent properties are not affected. The applicants will submit suggested draft language for your consideration after this upcoming June 14th informal review and when the formal Special Permit and Site Plan approval applications are filed.

With this background, and in support of the application for an informal review and comment by the Planning and Zoning Commission, we submit the following:

1. Improvement Location Survey prepared by Ryan and Faulds, LLC Land Surveyors dated January 29, 2008;
2. Draft Site Plan (ZSP-1) prepared by Redniss & Mead (**R&M**) dated May 21, 2021;
3. Acquisition Inquiry Exhibit – Version 1 prepared by R&M dated February 24, 2021 (submitted to CT DOT on April 7, 2021);
4. Acquisition Inquiry Exhibit – Version 2 prepared by R&M dated February 24, 2021 (submitted to CT DOT on April 7, 2021);
5. Land Lease Inquiry Exhibit prepared by R&M dated February 24, 2021 (submitted to CT DOT on April 7, 2021);
6. Renderings - Design B prepared by Claris Construction, Inc. ("**Claris**") dated May 7, 2021;

7. Floor Plan prepared by Claris dated May 7, 2021;
8. Preliminary Form B – Zoning Data;
9. Aerial Setbacks Exhibit prepared by R&M dated 6/3/2021;
10. Authorization letter signed by Four Seasons as applicant and owner authorizing Gregory and Adams, P.C. to act as its agent in this matter;
11. Authorization letter signed by NEVBC as applicant authorizing Gregory and Adams, P.C. to act as its agent in this matter;
12. NEVBC Slides dated May 21, 2021; and,
13. List of Project Professionals.

If you have any questions, please contact me.

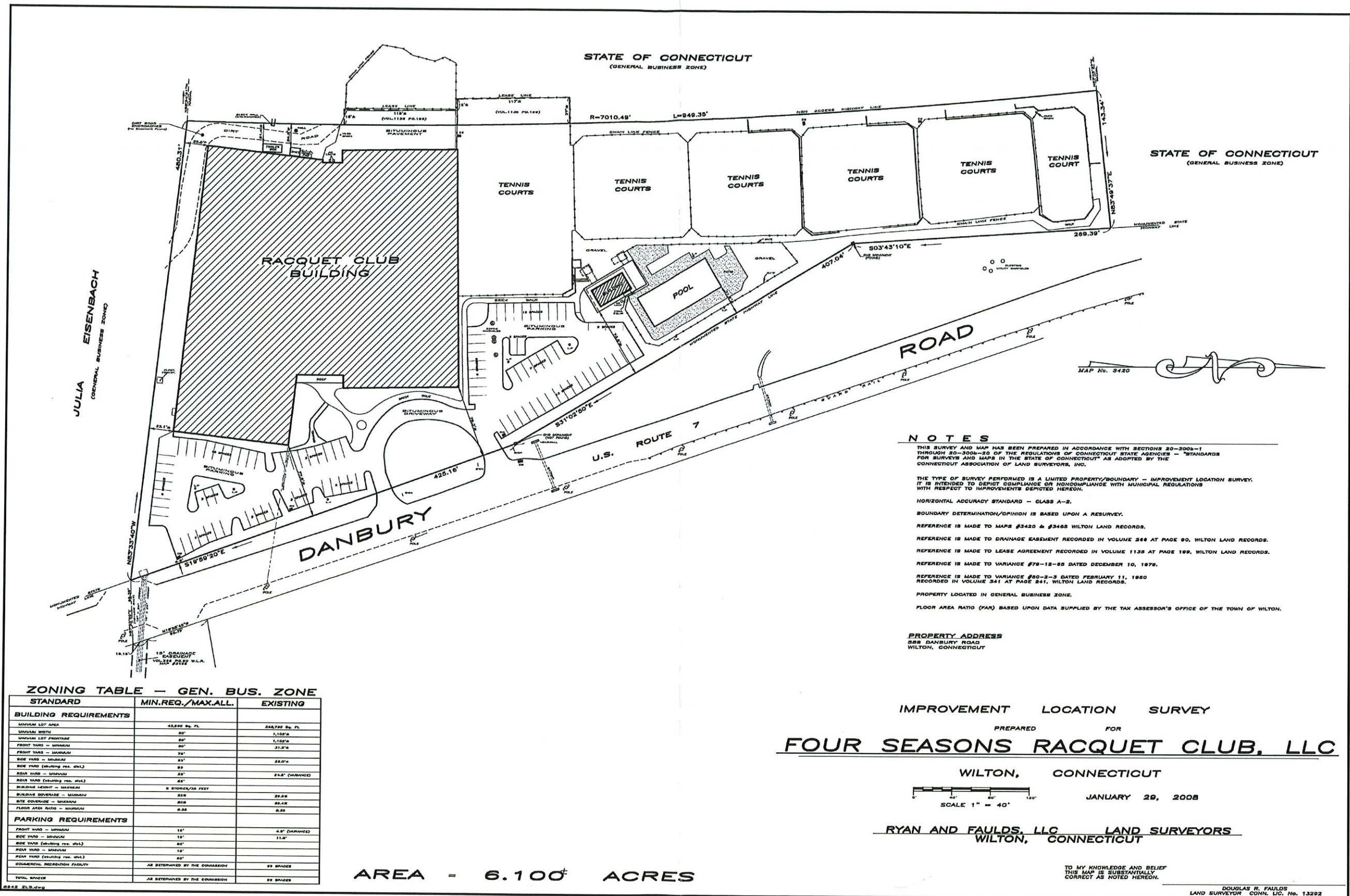
Respectfully submitted,
Gregory and Adams, P.C.

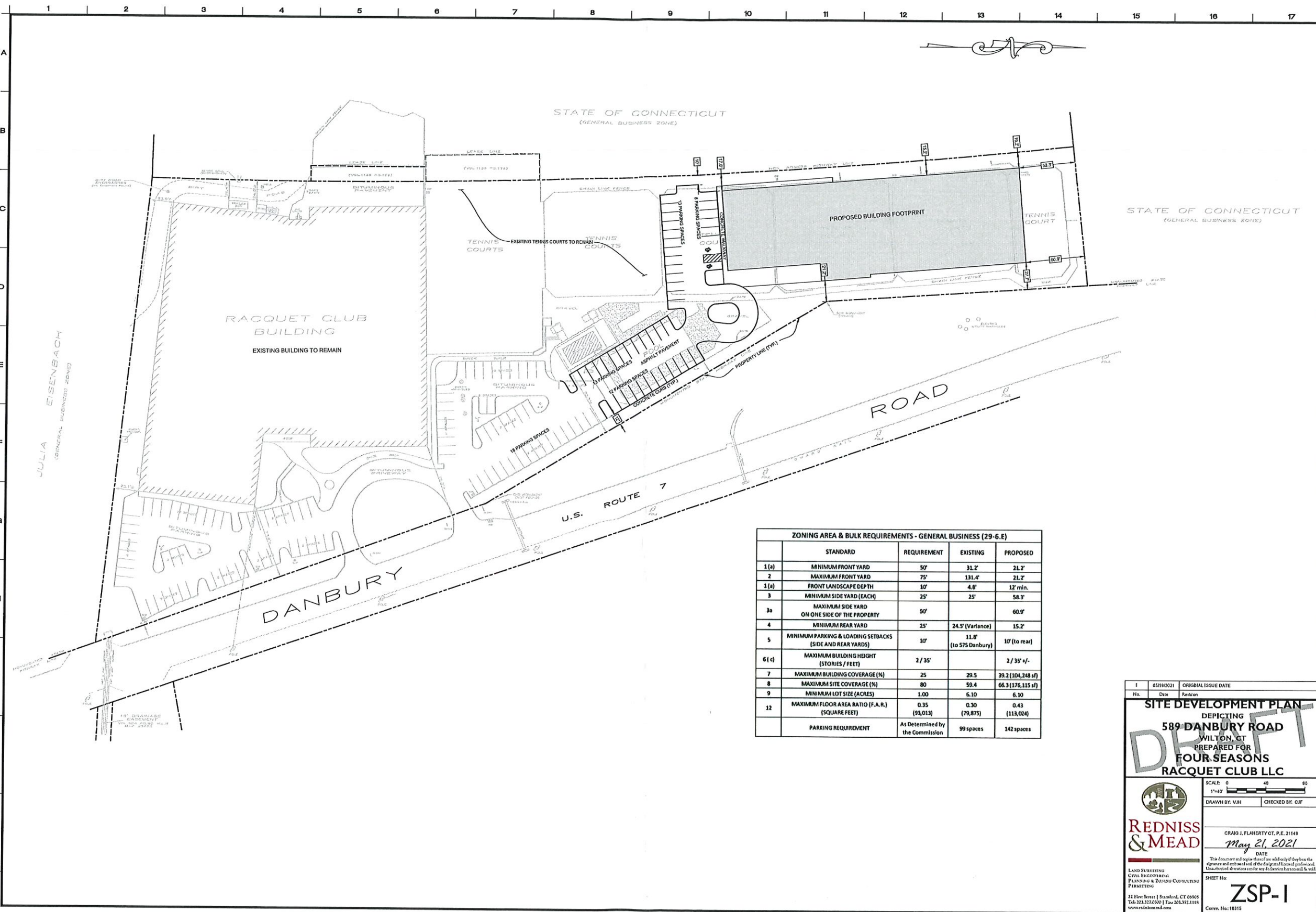
By: /s/ James D'Alton Murphy
James D'Alton Murphy

JD'AM/ko/klr

Enclosures

cc: Mr. Greg Moran – Four Seasons Racquet Club, LLC
Ms. Cat Dailey Minyard and Mr. Garrett Minyard – Northeast Volleyball Club, LLC
Mr. Richard Casner
Messrs. Craig Flaherty and Vincent Hynes– Redniss & Mead
Mr. Mike Kozlowski – Claris Construction, Inc.





ZONING AREA & BULK REQUIREMENTS - GENERAL BUSINESS (29-6.E)				
	STANDARD	REQUIREMENT	EXISTING	PROPOSED
1 (a)	MINIMUM FRONT YARD	50'	31.2'	21.2'
2	MAXIMUM FRONT YARD	75'	131.4'	21.2'
1 (a)	FRONT LANDSCAPE DEPTH	10'	4.8'	12' min.
3	MINIMUM SIDE YARD (EACH)	25'	25'	58.3'
3a	MAXIMUM SIDE YARD ON ONE SIDE OF THE PROPERTY	50'		60.9'
4	MINIMUM REAR YARD	25'	24.5' (Variance)	15.2'
5	MINIMUM PARKING & LOADING SETBACKS (SIDE AND REAR YARDS)	10'	11.8' (to 575 Danbury)	10' (to rear)
6 (c)	MAXIMUM BUILDING HEIGHT (STORIES / FEET)	2 / 35'		2 / 35' +/-
7	MAXIMUM BUILDING COVERAGE (%)	25	29.5	39.2 (104,248 sf)
8	MAXIMUM SITE COVERAGE (%)	80	59.4	66.3 (176,115 sf)
9	MINIMUM LOT SIZE (ACRES)	1.00	6.10	6.10
12	MAXIMUM FLOOR AREA RATIO (F.A.R.) (SQUARE FEET)	0.35 (93,013)	0.30 (79,875)	0.43 (113,024)
	PARKING REQUIREMENT	As Determined by the Commission	99 spaces	142 spaces

105/19/2021

05/19/2021

ORIGINAL ISSUE DATE

No.

Date

Revision

SITE DEVELOPMENT PLAN

DEPICTING

589 DANBURY ROAD

WILTON, CT

PREPARED FOR

FOUR SEASONS

RACQUET CLUB LLC

SCALE: 0 40 80

1"=40'

DRAWN BY: VJR

CHECKED BY: CJF

CRAB J. FLAHERTY, P.E. 21148

May 21, 2021

DATE

May 21, 2021

REDNISS & MEAD

LAND SURVEYING

CIVIL ENGINEERING

PLANNING & ZONING CONSULTING

PERMITTING

22 Elm Street | Stamford, CT 06905

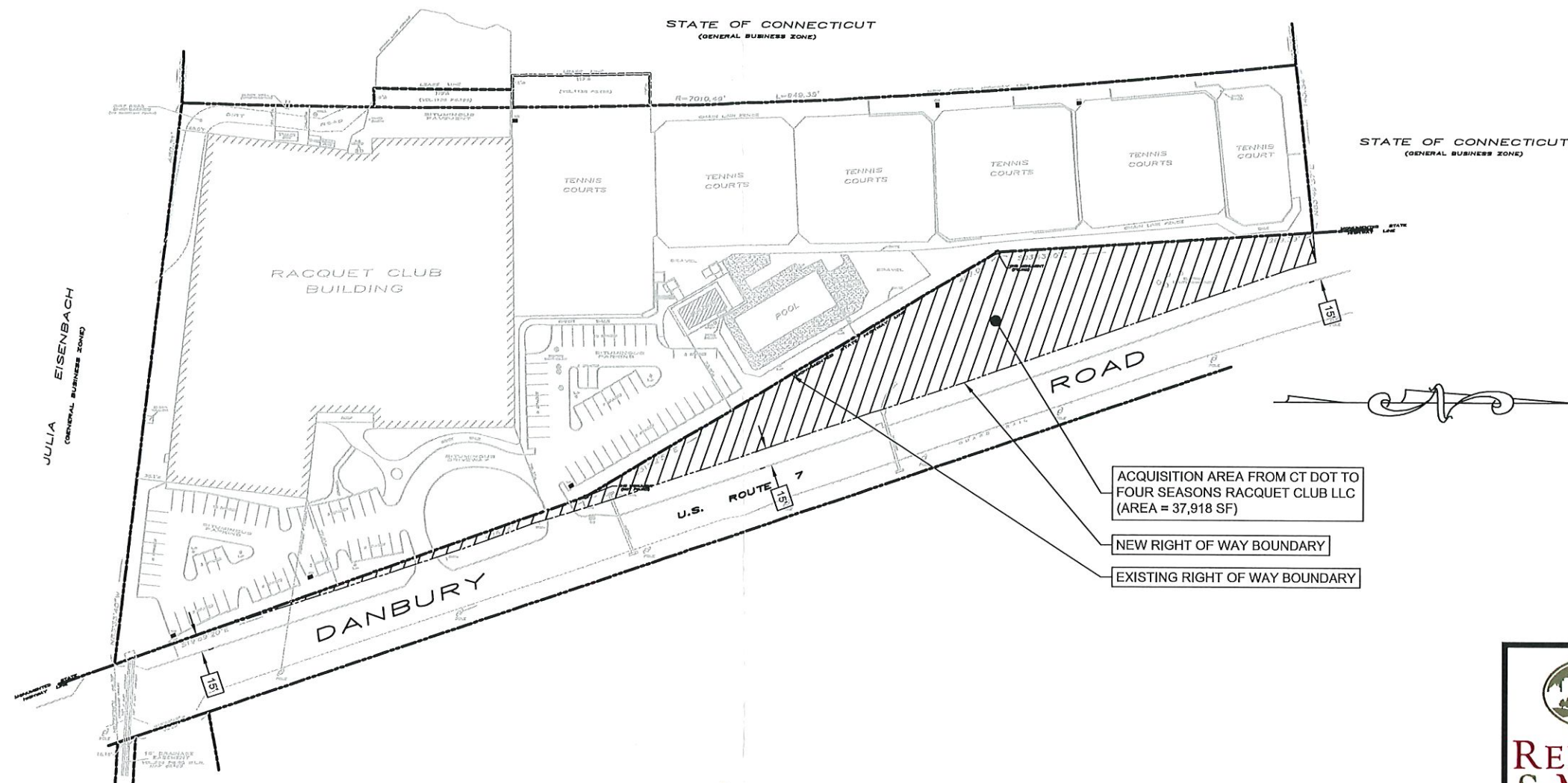
Tel: 203.372.0500 | Fax: 203.372.1114

www.rednissandmead.com

SHEET No:

ZSP-1

Comm. No: 10315



ACQUISITION INQUIRY EXHIBIT
589 DANBURY ROAD
WILTON, CT

VERSION I



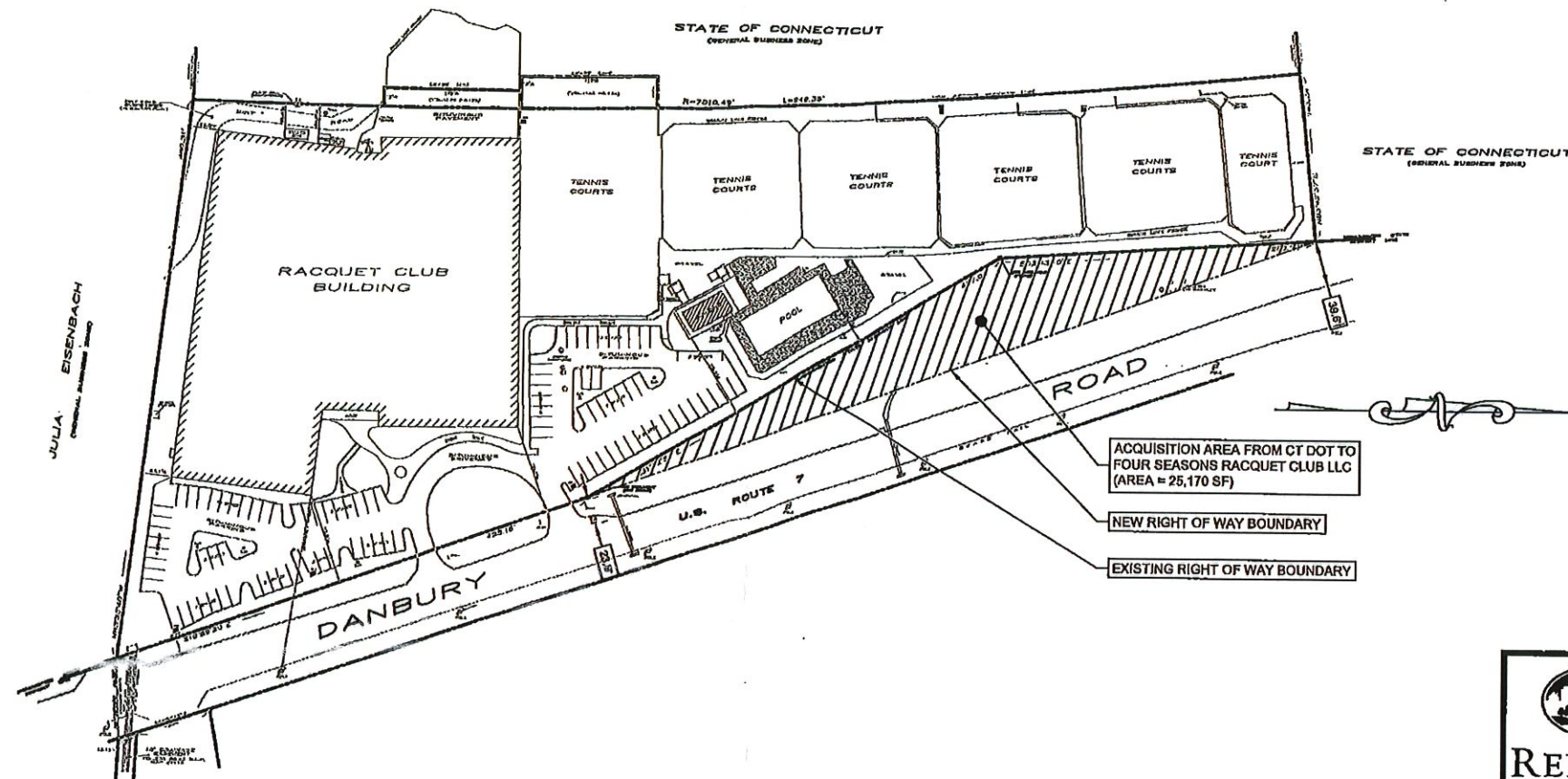
**REDNISS
& MEAD**

LAND SURVEYING
 CIVIL ENGINEERING
 PLANNING & ZONING CONSULTING
 PERMITTING

22 First Street | Stamford, CT 06905
 Tel: 203.327.0500 | Fax: 203.357.1118
 www.rednissmead.com

COMM. NO.: 10315	DATE: 2/24/2021
SCALE: 1"=100'	

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ACQUISITION INQUIRY EXHIBIT
589 DANBURY ROAD
WILTON, CT

VERSION 2

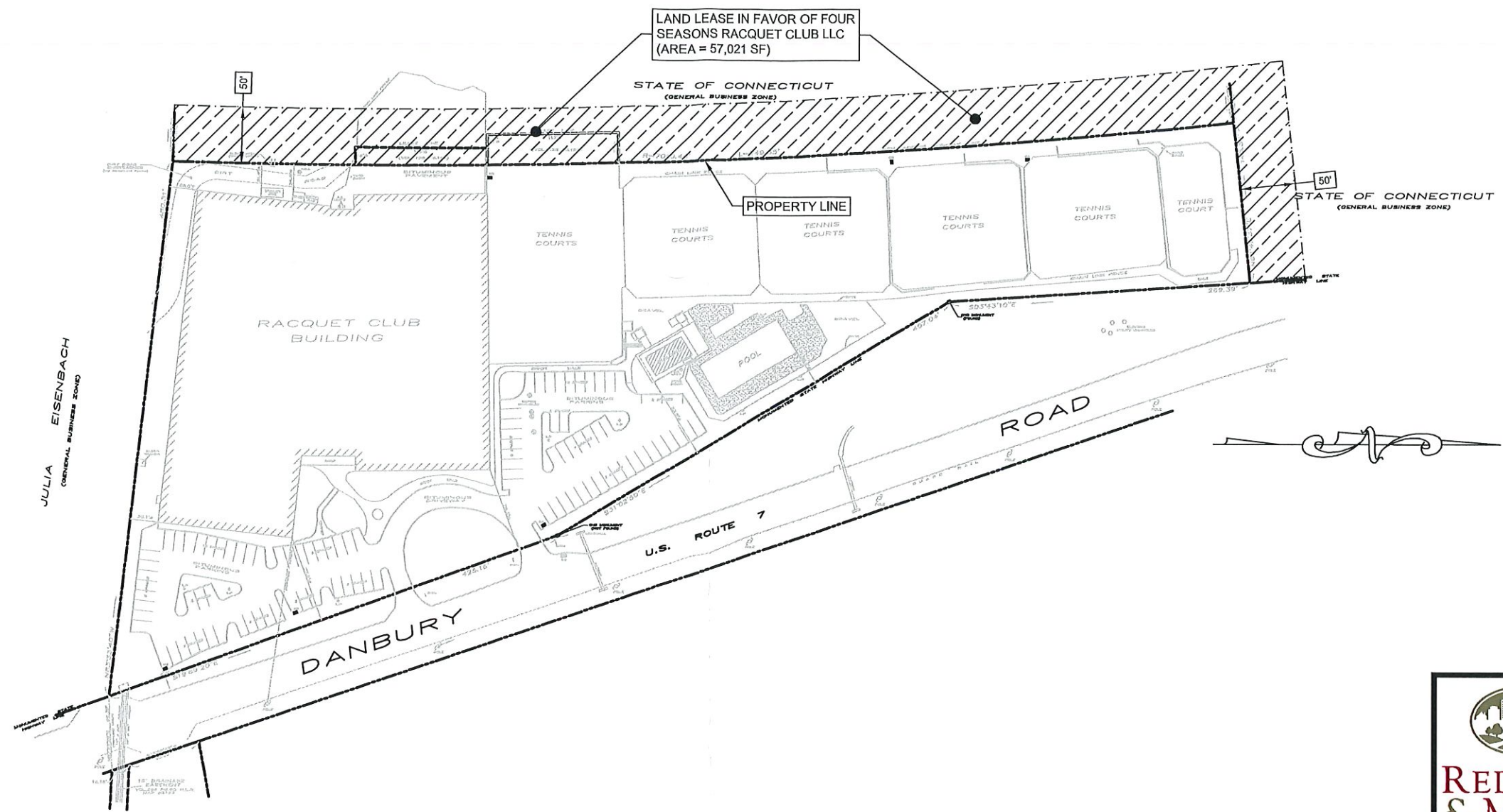
REDNISS & MEAD

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21 First Street | Stamford, CT 06905
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COMM. NO.: 10315	DATE: 2/24/2021
SCALE: 1"=100'	

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LAND LEASE INQUIRY EXHIBIT
589 DANBURY ROAD
WILTON, CT



**REDNISS
& MEAD**

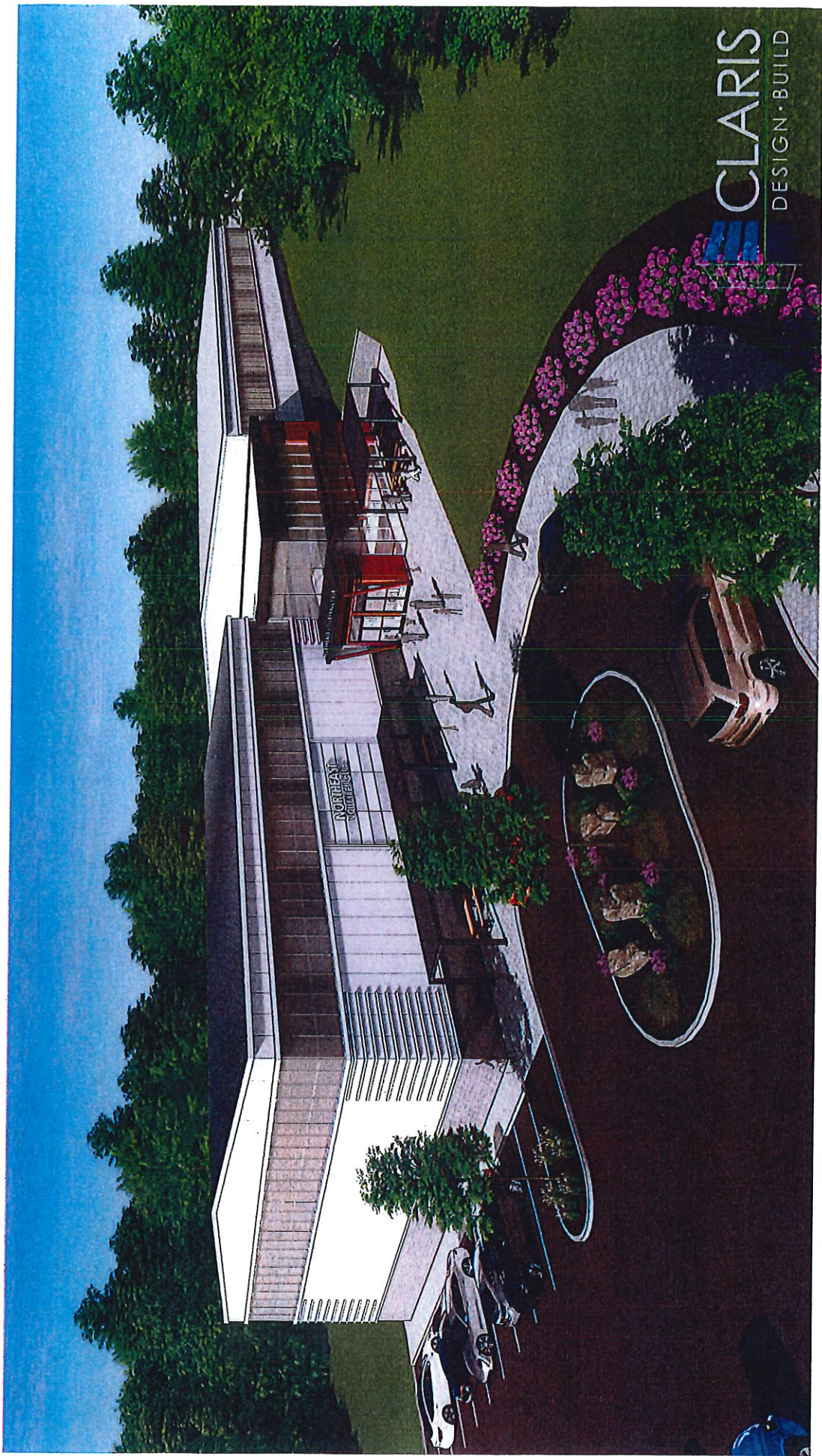
LAND SURVEYING
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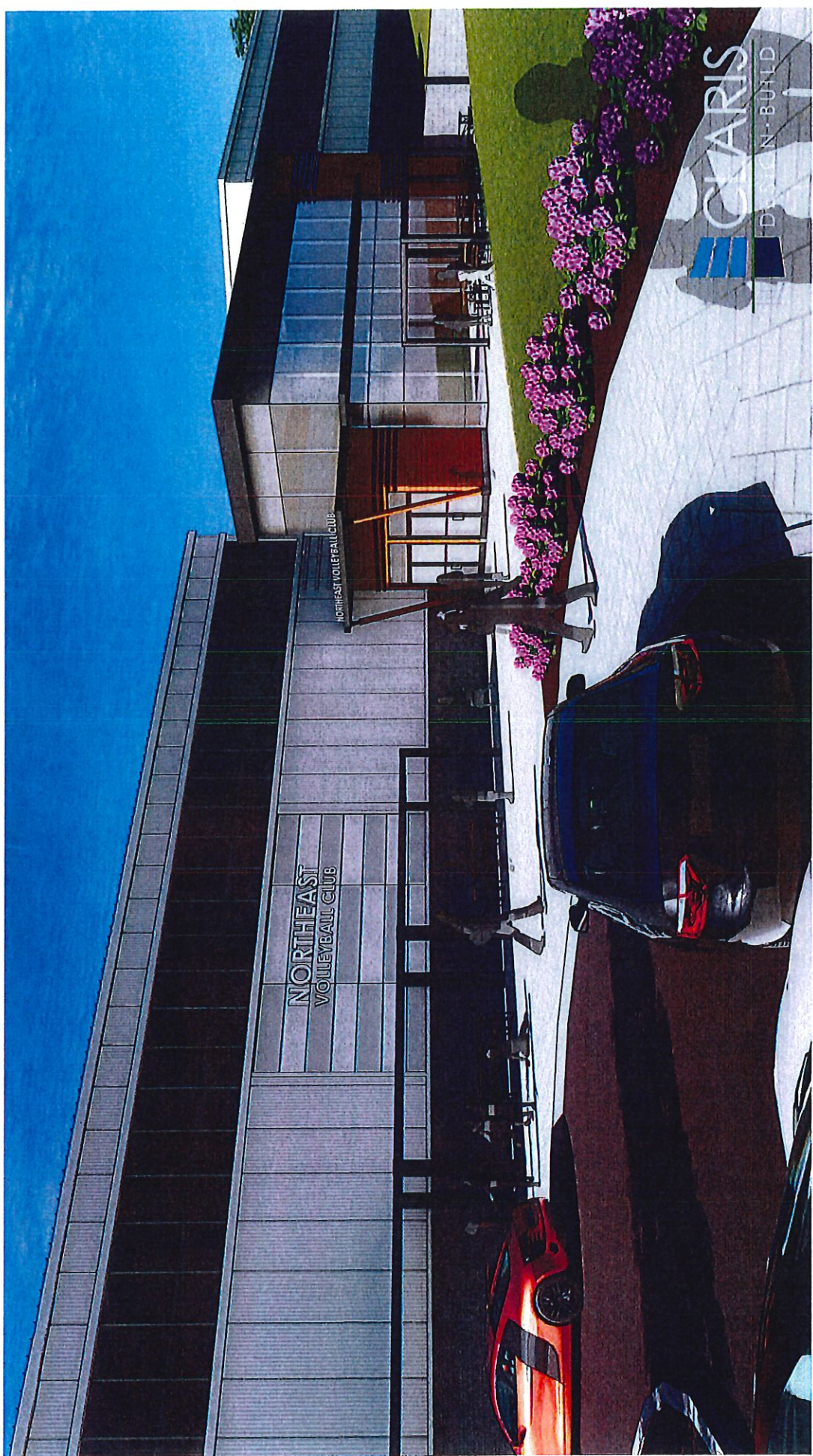
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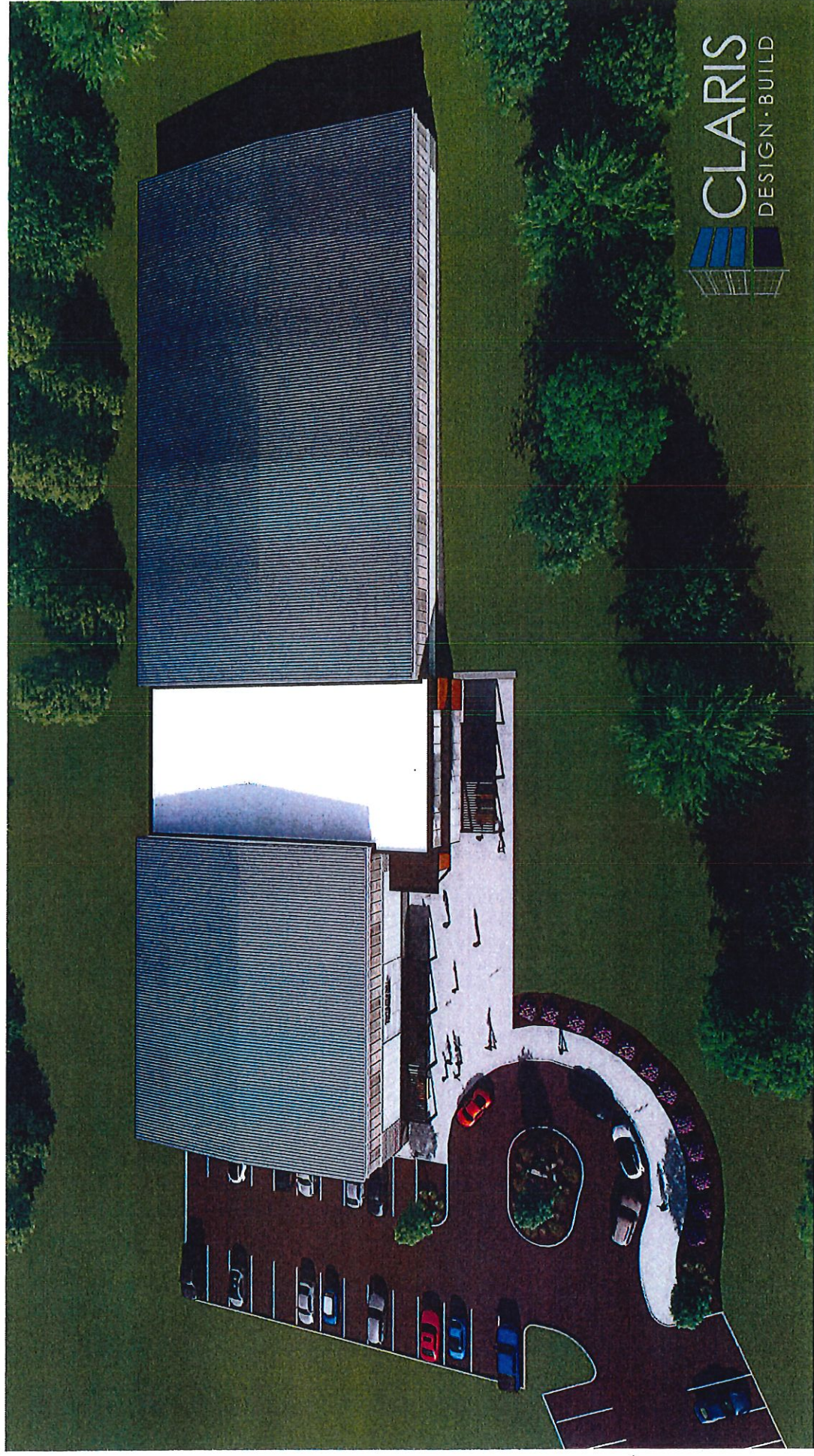
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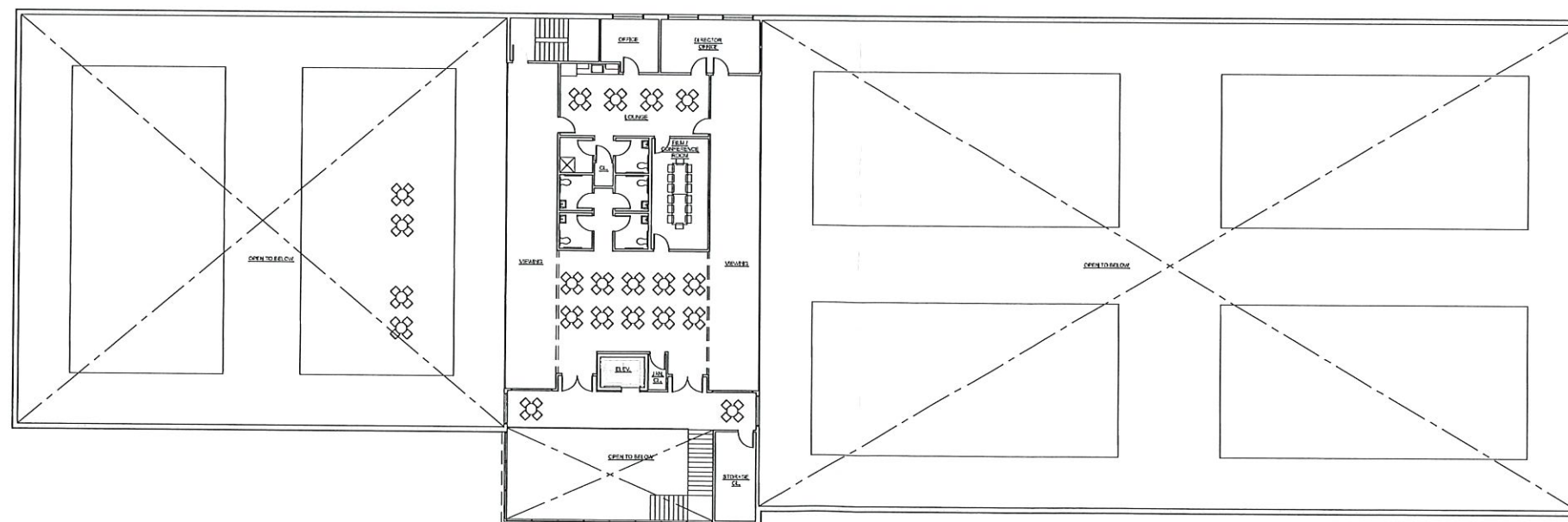
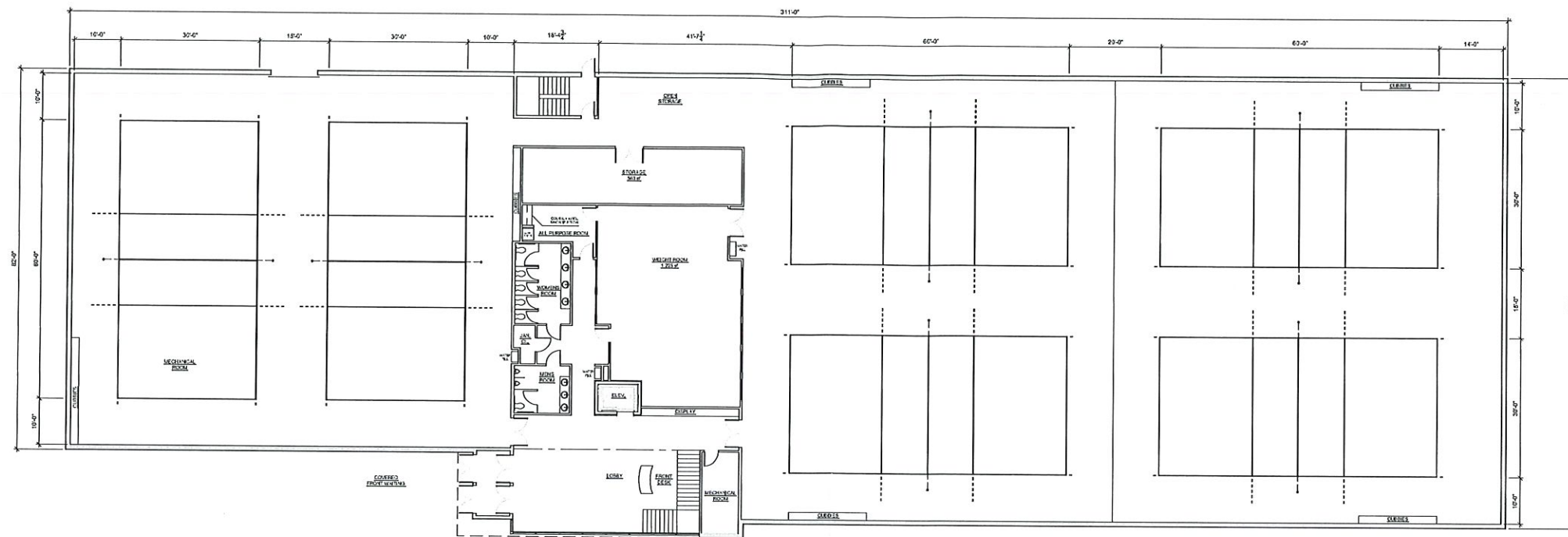












THIS DRAWING IS THE PROPERTY OF CLARIS CONSTRUCTION HAS BEEN PREPARED SPECIFICALLY FOR THE OWNER FOR THIS PROJECT AT THIS SITE, AND IS NOT TO BE USED FOR ANY OTHER PURPOSE, LOCATION, OR OWNER WITHOUT WRITTEN CONSENT OF CLARIS

MAIN STREET
WILTON, CT

[illegible]

FLOOR PLAN

ATHLETIC

Project Number

Date	5/4/21
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Drawn By	MRK
----------	-----

Checked By	
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Scale	As Noted
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A-101

WILTON PLANNING AND ZONING COMMISSION	PRELIMINARY	FORM B - ZONING DATA
Include the following data on the required Site Development Plan, as well.		

589 Danbury Road	6.10 acres
PROPERTY ADDRESS	LOT ACREAGE
GB	1,102' +/-
ZONING DISTRICT	LOT FRONTAGE

	PER ZONING REGS (MAX OR MIN ALLOWED)	EXISTING	PROPOSED	TOTAL
GROSS FLOOR AREA [SF]				
BUILDING FOOTPRINT [SF]				
BUILDING COVERAGE [SF/%] (round up)	66,438 sf (25%)	78,574 sf (29.5%)	Net: +25,674 sf (9.7%)	104,248 sf (39.2%)
BUILDING HEIGHT [FT - Story]	35 ft - 2 stories		35 ft +/- , 2 stories	
FLOOR AREA RATIO (F.A.R.)	0.35	0.30	0.13	0.43
PARKING SPACES (round up)	As Determined by the Commission	99	Net: +43	142
LOADING SPACES				
SITE COVERAGE [SF/%]	212,600 sf (80%)	157,810 sf (59.4%)	Net: +18,305 sf (6.9%)	176,115 sf (66.3%)

OFF-STREET PARKING AND LOADING CALCULATIONS

Please provide the specific calculation used to determine the minimum required off-street parking and loading spaces pursuant to the Zoning Regulations.

<u>PARKING CALCULATION</u> (Use separate page, if necessary)
<u>LOADING CALCULATION</u> (Use separate page, if necessary)

PLAN OF CONSERVATION AND DEVELOPMENT
Please indicate on separate page how this proposal complies with the Plan of Conservation and Development.

THE UNDERSIGNED WARRANTS the truth of all statements contained herein:
<div><div><div>1</div><div></div></div><div>DRAFT</div><div>6/1/21</div></div> <div>APPLICANT'S SIGNATURE</div> <div>DATE</div>



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§ALSO ADMITTED IN MASSACHUSETTS

May 13, 2021

By E-Mail Only

Mr. Greg Moran
Four Seasons Racquet Club, LLC
589 Danbury Road
Wilton, CT 06897

Re: Four Seasons Racquet Club, LLC and Northeast Volleyball Club L.L.C. -
Applications to Wilton Land Use Agencies
Premises: 589 Danbury Road, Wilton, Connecticut

Dear Greg:

The Town of Wilton, State of Connecticut and other government agencies, if applicable, require written authorization from Four Seasons Racquet Club, LLC as an applicant and owner of the property located at 589 Danbury Road, Wilton, Connecticut authorizing Gregory and Adams, P.C. to act as its agent in connection with any and all land use matters involving the subject property. Please sign a copy of this letter and return it to me by email or fax @ 203-834-1628.

Very truly yours,

/s/ *James D’Alton Murphy*

James D’Alton Murphy

JD’AM/ko

The undersigned hereby authorizes Gregory and Adams, P.C. to act as its agent in connection with the above-referenced applications.

Four Seasons Racquet Club, LLC

By: *Greg Moran*

Greg Moran
Its: Managing Member
Duly Authorized

GREGORY AND ADAMS, P.C.

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May 13, 2021

By E-Mail Only

Mr. Garrett Minyard
Ms. Cat Dailey
Northeast Volleyball Club LLC
589 Danbury Road
Wilton, CT 06897

Re: Four Seasons Racquet Club, LLC and Northeast Volleyball Club LLC
Applications to Wilton Land Use Agencies
Premises: 589 Danbury Road, Wilton, Connecticut

Dear Garrett and Cat:


The Town of Wilton, State of Connecticut and other government agencies, if applicable, require written authorization from Northeast Volleyball Club LLC as an applicant authorizing Gregory and Adams, P.C. to act as its agent in connection with any and all land use matters involving the subject property. Would one of you please sign a copy of this letter and return it to me by email or fax at 203-834-1628?

Very truly yours,

/s/ James D'Alton Murphy
James D'Alton Murphy

JD'AM/ko

The undersigned hereby authorizes Gregory and Adams, P.C. to act as its agent in connection with the above-referenced applications.

Northeast Volleyball Club LLC
By: 
Owner & Director, Northeast Volleyball Club
Duly Authorized