

HUBERT UNITED

Eastern Onslow Growth and Infrastructure

Decision packet for the September 21 2026 rezoning hearings

REQUESTS BEFORE THE BOARD

CREZ-2026-00005 Greene Sloan and Forestar • Sweetbrier Drive

PREZ-2026-00009 Harry C Brown Family • 351 Queens Creek Road

Requested decision

Deny both map amendments on the present record. If the Board needs additional evidence, continue the hearings until a cumulative capacity review and project-specific mitigation record are complete.

Prepared September 15 2026

hubertunitednc.org

Letter to the Board

RESPECTFULLY SUBMITTED IN ADVANCE OF THE PUBLIC HEARINGS

September 15, 2026

Chairman Tim Foster, Vice Chairman Robin Knapp, and Commissioners Royce Bennett, Paul Buchanan, Lisa Carpenter, John Davis, and Tony Padgett
Onslow County Board of Commissioners
234 NW Corridor Boulevard
Jacksonville, North Carolina 28540

Dear Chairman Foster and Members of the Board

Thank you for the time, preparation, and difficult judgment your public service requires. We recognize that you must weigh property rights, housing needs, public safety, taxes, infrastructure, military readiness, environmental conditions, and the long-term interests of the entire County. Hubert United submits this packet in that same spirit of responsibility.

We are not asking the County to stop all growth. We are asking the County not to increase development rights in eastern Onslow faster than the systems serving that growth can safely and reliably absorb it. The official records for the two September 21 requests show school crowding, a Queens Creek Road count above the staff report's Level of Service D benchmark, major transportation and water improvements scheduled years away, unresolved utility-capacity questions, and meaningful floodplain or wetland considerations.

These are not isolated applications. They draw on the same school cluster, the same limited east-west and north-south corridors, the same emergency-response network, and related water and wastewater systems. Reviewing each file as if the other approved and pending development does not exist understates the decision the Board is actually making.

For those reasons, Hubert United respectfully asks you to deny CREZ-2026-00005 and PREZ-2026-00009 on the present record. If you believe a final decision requires more information, we ask you to continue the hearings rather than approve into uncertainty. A short delay is recoverable. A permanent increase in entitlement is much harder to undo.

We are grateful for your consideration and for the opportunity to place this evidence and these proposed solutions before you.

Respectfully submitted

Hubert United

A resident-led voice for responsible growth in eastern Onslow County

Decision Brief

The issue is not whether growth will occur. The issue is whether new entitlement should be granted before the County can document that the affected systems have sufficient carrying capacity.

RECOMMENDED ACTION

- 1. **Deny** CREZ-2026-00005 and PREZ-2026-00009 on the present record.
- 2. **If the Board is not prepared to deny**, continue each hearing to a date certain and require the missing cumulative and project-specific evidence listed in this packet.
- 3. **Direct Planning and Development** to begin a focused 28539 and eastern Onslow land-use and infrastructure update, with measurable capacity thresholds and public participation.

Why the record supports caution

- **Schools** Both staff reports identify conflict with Horizon 2040 Objective 2.4 on school coordination. Their shared 2026–27 baseline is already above listed capacity at Queens Creek Elementary and Swansboro Middle.
- **Transportation** For the Queens Creek Road tract, the staff report lists 15,000 vehicles per day against an estimated LOS D design capacity of 13,600 at the cited count station.
- **Timing** The Queens Creek bridge replacement is scheduled for right-of-way and utilities in 2031 and construction beginning in 2033. A related water-main upgrade is programmed for FY 2029–2033.
- **Utilities** A major Highway 24 wastewater project is under construction, but the materials reviewed do not establish commissioning, available project-specific capacity, allocation, or downstream constraints for either request.
- **Land and water** The Brown tract includes VE and Coastal A flood-hazard areas and lacks a submitted wetlands evaluation. The Sweetbriar tract includes delineated wetlands and a Flight Path Overlay.
- **Proof** No comparable, filed by-right plan in the reviewed record establishes what either tract would actually yield under current RA zoning.

Evidence standard

Label	Meaning in this packet
Official record	A County, OCS, NCDOT, ONWASA, or State source.
Hubert United calculation	Transparent arithmetic using official inputs; never presented as an agency determination.
Not established	A material point the reviewed record does not prove. Absence of proof is not presented as proof of failure.

Record basis R1–R5, R8–R14, R18–R20

Cases Before the Board

The two requests are different in form, but they rely on the same public systems and should be evaluated together before each receives its own vote.

Question	CREZ-2026-00005	PREZ-2026-00009
Site	109.78 acres north of Sweetbrier Drive in White Oak Township	9.59 acres at 351 Queens Creek Road in Swansboro Township
Current zoning	Rural Agriculture	Rural Agriculture
Requested zoning	R-8M Conditional	Community Business conventional zoning
Proposal	Up to 240 detached homes on minimum 6,000-square-foot lots with an 8,000-square-foot average	No binding site plan in the conventional rezoning file; CB permits a range of neighborhood commercial uses and multifamily housing
Land use map	Suburban Growth	Urban Growth
School finding	Staff identifies inconsistency with Objective 2.4	Staff identifies inconsistency with Objective 2.4
Other plan conflicts	Staff also notes limited housing-type variety	Staff identifies conflicts with carrying capacity Objective 1.2 and environmental Objective 4.2
Road record	No Sweetbrier Drive count; NC 24 count is not a substitute for access-road conditions; adjacent Boyington Place TIA remained under review	Queens Creek Road count of 15,000 exceeds the report's estimated LOS D benchmark of 13,600
Water and sewer	Two-inch and four-inch water mains are identified nearby; Highway 24 wastewater corridor under construction	Six-inch water main and eight-inch sewer force main; water-main upgrade programmed FY 2029–2033
Environmental record	Forested and vacant; delineated wetlands and approved jurisdictional determination; partial Flight Path Overlay	Forested and primarily vacant; VE and Coastal A flood-hazard areas; Queens Creek boundary; no wetlands evaluation submitted

Important procedural difference

Sweetbriar is a conditional rezoning with a site plan and negotiated conditions. The Brown request is a conventional CB rezoning. Approval of the Brown request would apply the full CB district framework without a binding project plan in the rezoning decision.

Record basis R1, R2, R3, R17, R18

One Service Area

Separate case numbers do not create separate roads, classrooms, pipes, fire companies, or ambulances.

Both September 21 applications are evaluated against the same Queens Creek Elementary, Swansboro Middle, and Swansboro High baseline. Both feed the eastern Onslow transportation network. Both depend on infrastructure whose upgrades are partly under construction, programmed years away, unfunded, or not quantified in project-specific capacity letters.

<div>154</div> <div>students attributed to the two pending cases in the staff reports</div>	<div>249.37</div> <div>combined acres under consideration</div>	<div>2</div> <div>rezoning votes drawing on one service area</div>
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Combined school arithmetic

School	Capacity	Shared baseline	Sweetbriar	Brown	After both	Margin
Queens Creek Elementary	563	735	+61	+24	820	-257
Swansboro Middle	912	1,028	+24	+10	1,062	-150
Swansboro High	1,240	1,186	+25	+10	1,221	+19

Record basis R2 and R3. Hubert United arithmetic combines each report’s stated additions with their common baseline. It is not an OCS enrollment determination and does not add previously approved projects a second time.

What a cumulative addendum should include

- All approved but unbuilt, active, and pending residential projects assigned to the same school cluster and road network
- Net new trips by access point and peak period rather than distant corridor counts alone
- Water and wastewater allocations, pump-station and force-main constraints, commissioning status, and fire-flow availability
- EMS and fire demand using provider-reviewed response and unit-availability data
- Capital-project status separated into operational, under construction, fully funded, programmed, conceptual, and unfunded

Decision principle

A future project should count as capacity only when its scope, funding, delivery date, and service benefit to the affected area are documented.

Schools

The County’s own files do not show a comfortable eastern Onslow school margin. They show existing crowding and pending growth arriving before proposed new facilities are proven ready.

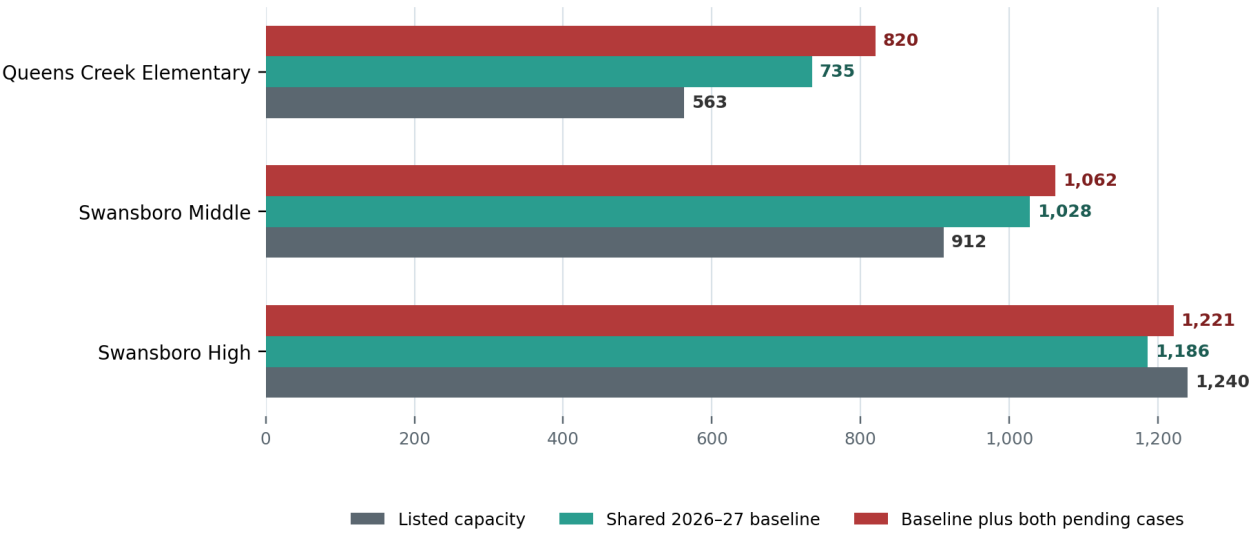


Figure 1 Shared staff-report baseline and combined pending-case arithmetic

The two staff reports use a projected 2026–27 baseline of 735 students at Queens Creek Elementary and 1,028 at Swansboro Middle—already above their listed capacities of 563 and 912. Adding the student estimates from both pending cases yields 820 and 1,062 respectively. Swansboro High would retain only 19 seats on the same arithmetic.

A second official snapshot points the same direction

School	Permanent capacity	May 2026 ADM	Utilization
Queens Creek Elementary	563	563	100.0%
Sand Ridge Elementary	573	574	100.2%
Swansboro Elementary	537	501	93.3%
Swansboro Middle	912	1,035	113.5%
Swansboro High	1,240	1,257	101.4%

Record basis R4 and R5. The May 29, 2026 OCS capacity report and the staff reports use different dates and measures. This packet does not force them into a single series; both show tight or negative margins in the affected cluster.

Working ledger signal

A Hubert United audit workbook totals 4,109 students against 3,825 seats across five eastern schools, a 284-seat deficit. After adding every approved and pending eastern project listed in that workbook, the deficit increases to 497 seats. The workbook mixes dates and project statuses, contains a formula error, and does not establish buildout phasing, so this packet does not present it as an official forecast. It is a strong reason for the County and OCS to publish one reconciled, project-level capacity ledger before additional large entitlements are granted.

School Capacity Timing

Countywide seats do not solve an attendance-area deficit unless students can actually be assigned to those seats without creating unreasonable travel or new crowding elsewhere.

What the planning record shows

- **OCS planning materials** identify 3,931 planned housing units in the White Oak area—the largest of the three areas shown in the cited construction proposal.
- **The proposal** depicts an 800-seat eastern middle school with an estimated cost of \$63.871 million and a May 2029 concept schedule.
- **It also depicts** an 800-seat eastern elementary school with an estimated cost of \$58.497 million and a May 2031 concept schedule.
- **The materials reviewed do not establish** full funding, a secured site, a design contract, construction authorization, or a guaranteed opening date for either school.

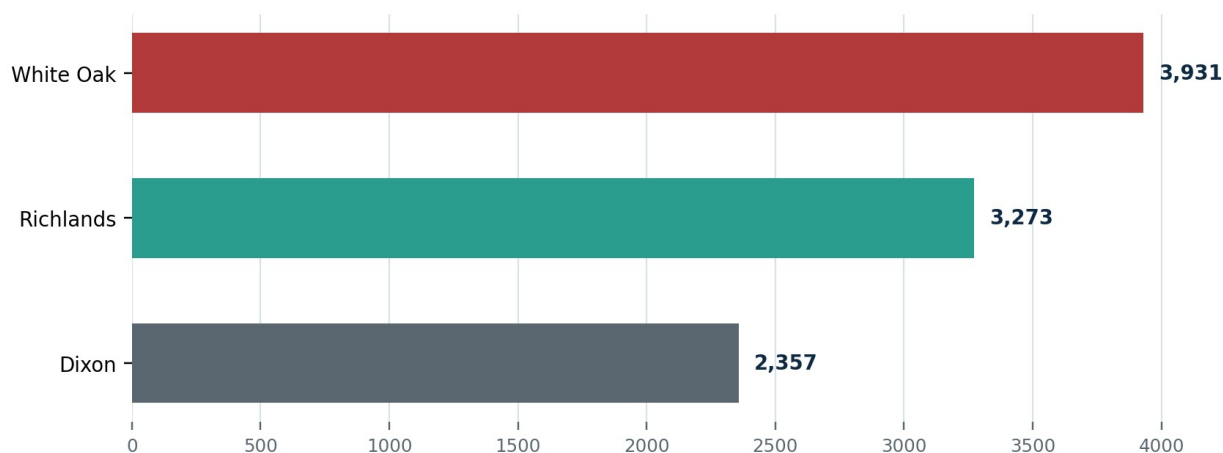


Figure 2 OCS future construction proposal values

Record basis R6. Planned units are not the same as occupied units or a fixed delivery schedule. Their relevance is that OCS itself used the pipeline to frame future school construction needs.

The practical test

Do not book conceptual seats as current capacity

Before relying on a future school, ask for the funding source, site control, design status, construction authorization, opening date, attendance-area plan, and the number of project students it will actually absorb.

Woodland Elementary opened for 2025–26 and adds meaningful elementary capacity, but it does not create middle- or high-school seats. Mobile classrooms can relieve pressure, but the permanent-capacity figures above intentionally exclude them and the County continues to budget for mobile units.

Transportation

The strongest transportation fact in the September 21 record is simple and location-specific. At the Queens Creek Road count station cited for the Brown tract, measured traffic already exceeds the staff report’s LOS D benchmark.

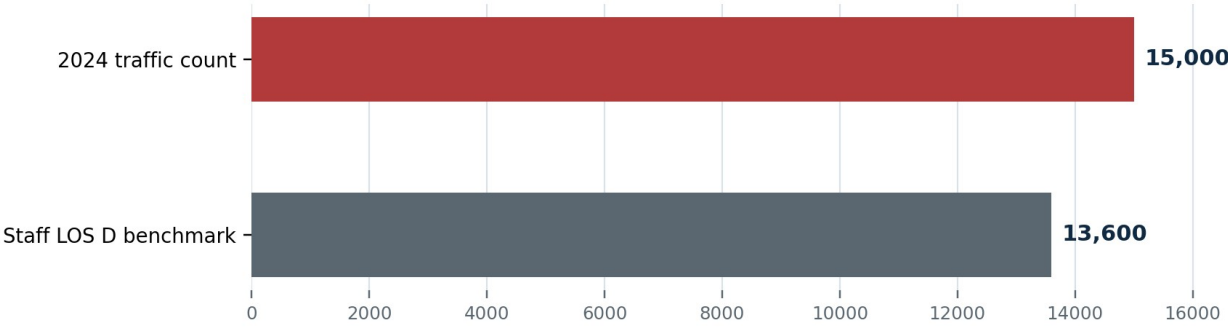


Figure 3 Queens Creek Road at the count station cited in PREZ-2026-00009

Record basis R3. These values are point-specific and should not be applied to every segment of Queens Creek Road.

Projects and timing

Improvement	Status	Meaning for this decision
Queens Creek bridge B-5944	Funded in current STIP	Right-of-way and utilities 2031; construction begins 2033; about \$32.9 million in future phases
Queens Creek Road widening H140105	Unfunded prioritization candidate	NC 24 to Jones Road; no funded delivery date in the reviewed record
NC 24 widening R-5885	Unfunded	Belgrade–Swansboro Road to Front Street; approximately \$114.5 million estimate in the reviewed record
Highway safety work	Recommendations documented	Completion of the July 2025 curve and bridge-approach recommendations was not confirmed in the reviewed material

Transportation Questions

A high count on NC 24 does not answer what happens at Sweetbrier Drive. A future bridge does not provide present-day roadway capacity. A condition that may disappear if another agency declines it is not guaranteed mitigation.

Sweetbriar questions left open

- The staff report provides no AADT count for Sweetbrier Drive.
- The cited NC 24 count of 31,500 is roughly 0.30 mile southwest and does not measure the proposed access road.
- Boyington Place, a 180-unit apartment project sharing the access point, had a traffic-impact analysis still under NCDOT review and no approved scope at the time of the staff report.
- The listed Sweetbriar conditions contain internal sidewalk and buffer commitments but no identified off-site roadway improvement.

Crash record handled transparently

For the NC 24 and Queens Creek Road study area, an NCDOT email reports 126 crashes over five years while the formal overview reports 125. The email identifies 34 injury crashes, 66 during the afternoon peak, and 62 involving left turns. Hubert United discloses the one-crash difference rather than selecting whichever figure sounds stronger. The conclusion does not depend on that discrepancy: the intersection has a documented crash history and a large left-turn component.

Record basis R8–R11. Crash figures are descriptive, not a professional causation analysis and not a prediction of crashes from either pending project.

Evidence to require before approval

- A completed, agency-reviewed cumulative traffic analysis that includes approved and pending projects using the same network
- Peak-hour turning movements and queue analysis at the actual access points
- Written NCDOT confirmation of required improvements, timing, responsibility, and what happens if a permit is denied
- A phasing plan tied to completed roadway improvements rather than forecast dates

Water and Wastewater

A pipe shown on a map proves proximity. It does not, by itself, prove available pressure, treatment capacity, pump-station capacity, allocation, fire flow, or a date when service can be relied upon.

What is documented

Record item	Documented fact
Highway 24 wastewater corridor	About 36,000 feet of 16- and 18-inch force main, two new pump stations, and two rehabilitated stations; construction began in December 2024 with a fall 2026 target shown on ONWASA’s project page
Swansboro wastewater facility in 2025	0.600 MGD permitted capacity; 0.408 MGD average daily flow; 0.659 MGD maximum day; violations reported in January, May, and September; force-main project expected to redirect flow to Camp Lejeune
Webb Creek facility in 2025	0.350 MGD permitted capacity; report lists 0.237 MGD average and 0.318 MGD maximum day; no 2025 violations
Sweetbriar water context	Two-inch and four-inch mains identified along nearby Elizabeth Drive; staff report does not provide a project-specific capacity or fire-flow certification
Brown water context	Six-inch water main and eight-inch sewer force main identified; Queens Creek Road water-main upgrade programmed for FY 2029–2033

Record basis R2, R3, R12, R13. The annual report’s printed Webb Creek average-flow value and printed percentage do not reconcile arithmetically; this packet therefore reproduces the flow values without deriving a utilization percentage.

What is not established

- That the Highway 24 system is commissioned and operational for these projects as of the hearing date
- The capacity already committed to approved but unbuilt development
- The limiting pump station, force main, treatment agreement, or downstream component for each site
- Available water pressure and fire flow at full project buildout
- The capital cost and responsible payer for every required extension or upgrade

Requested proof

Obtain an ONWASA letter for each site identifying allocation, current and committed demand, limiting components, required improvements, construction responsibility, and the earliest service date after testing and acceptance.

Land Water and Emergency Services

The record supports careful questions, not dramatic predictions. Hubert United does not claim that either project will inevitably flood or that an ambulance will fail to arrive. We claim that those public-interest questions have not been answered at a scale equal to the entitlement requested.

Environmental and drainage record

- **The Brown tract** is mapped in VE and Coastal A Special Flood Hazard Areas, with coastal high-hazard and wave-action conditions noted by staff. Queens Creek borders the southern property line.
- **No wetlands evaluation** was submitted for the Brown request; the file indicates potential wetlands would be evaluated later.
- **The Sweetbriar tract** has delineated wetlands and an approved jurisdictional determination, but a wetlands determination is not the same as a cumulative off-site drainage analysis.
- **The County’s December 2025 stormwater resolution** recognizes that growth and projects over the next decade will bring runoff impacts and encourages low-impact development practices.

Fire and EMS record

- The Sweetbriar file identifies Hubert Fire District ISO Class 5; the Brown file identifies Northeast Onslow ISO Class 4. ISO classifications are not a project-specific capacity or response-time study.
- The FY 2027 budget includes construction of three EMS stations and 22 new positions across ten departments to meet growing service demands.
- The County’s Mobile Integrated Health program is intended in part to preserve ambulance availability for serious calls. That investment is prudent, but the reviewed rezoning files do not quantify incremental EMS demand or eastern-area unit availability.

Record basis R2, R3, R14–R16

Evidence to require

System	Minimum decision record
Drainage	Existing watershed conditions, downstream conveyance, pre- and post-development discharge, maintenance responsibility, and cumulative approved-development assumptions
Fire	Provider-reviewed fire-flow, apparatus access, staffing, and response analysis at full buildout
EMS	Current response and unit-availability data for the service area plus estimated annual calls from the proposal
Military compatibility	Written treatment of Flight Path Overlay conditions and any applicable installation coordination

Why the Land Use Plan Needs a Local Update

A future land-use color is a planning guide, not a finding that every supporting system has sufficient capacity on the day of a rezoning vote.

Horizon 2040 is the County’s comprehensive and CAMA land-use plan. The County describes it as the guiding roadmap for zoning decisions. The 2025–2030 Strategic Plan likewise calls for growth to be directed to places with existing or planned infrastructure and services that have sufficient carrying capacity to protect residents’ quality of life.

The September 21 files expose a conflict inside that framework. Their map designations point toward Suburban or Urban Growth, yet both staff reports identify inconsistency with school-coordination Objective 2.4. The Brown report also identifies inconsistency with Objective 1.2 on sufficient carrying capacity and Objective 4.2 on environmental protection. Those findings do not mean staff failed. They mean the map and current system conditions are pulling in different directions.

Hubert United conclusion

When the future land-use map repeatedly supports higher intensity while the same staff analysis documents insufficient carrying capacity, the responsible response is to update the area plan—not to treat the map color as automatic approval.

Requested 28539 and eastern Onslow update

- Use school attendance areas, watersheds, utility service areas, fire and EMS districts, and road networks—not ZIP code alone—to define the study boundary
- Inventory approved, pending, and reasonably foreseeable development with a common unit and phasing method
- Establish measurable thresholds for school utilization, road operations and safety, water, wastewater, fire, EMS, and drainage
- Separate operational capacity from projects that are under construction, funded, programmed, conceptual, or unfunded
- Tie future intensity and phasing to verified capacity milestones and a transparent proportionate-share framework
- Conduct public workshops in Hubert and publish the data, assumptions, and annual updates

Record basis R18, R19. The County’s January 2026 infrastructure resiliency study also recognizes the need to understand interdependent water, wastewater, energy, and transportation systems under emergencies and future growth.

Existing Zoning Is Not the Same Project

Saying a developer may build something under current zoning is not the same as proving that the same project will be built, that the same number of lots is feasible, or that the Board gains nothing by denying a rezoning.

Five facts that should control the discussion

- **Denial preserves the present zoning** It does not approve a subdivision, site plan, driveway, utility connection, stormwater plan, wetland impact, or building permit.
- **Gross density is not net yield** Acreage multiplication does not deduct roads, drainage facilities, open space, buffers, setbacks, easements, wetlands, flood hazards, soils, septic limitations, access geometry, or agency requirements.
- **The zoning requests have real economic value** Applicants invest in surveys, engineering, plans, and hearings because the requested district changes what can be built or how efficiently it can be built. The Board should not treat that entitlement as meaningless.
- **Conditional zoning is a tool rather than an entitlement** Site-specific conditions may address expected impacts, but the law does not require approval merely because conditions are offered.
- **The public-interest test remains** North Carolina law expressly allows the Board’s reasonableness analysis to consider physical conditions, benefits and detriments to neighbors and the community, present and permissible development, public interest, and changed conditions.

The two applications show why proof matters

Application	What current RA arithmetic can show	What it cannot show
Sweetbriar	At two lots per gross acre, 109.78 acres produces a rough ceiling of about 220 lots before deductions. The conditional plan requests up to 240.	A buildable RA lot count, utility method, access design, road mileage, wetlands and stormwater deductions, or economic feasibility
Brown	RA preserves a lower-intensity district. The requested conventional CB district expands the permitted-use envelope and allows multifamily housing.	What use would actually be built, how many dwellings or square feet, traffic, student yield, access design, or mitigation —because no binding site plan accompanies the conventional rezoning

Record basis R2, R3, R20, R21. The Sweetbriar gross calculation is Hubert United arithmetic and is intentionally labeled a ceiling, not a feasible yield.

A Fair Test for Any They Will Build Anyway Claim

The answer is not to accuse an applicant of bluffing. The answer is to require comparable evidence before an untested fallback scenario influences a legislative vote.

The recent Starling Cove precedent

The July 2026 Starling Cove discussion compared a 130-home conditional plan with a theoretical 122-lot Rural Agriculture maximum, yet the reviewed file contained no comparable RA plan establishing 122 buildable lots. Hubert United respectfully asks the Board not to make an unverified gross calculation a standing assumption.

Ask for an apples to apples submission

Comparison rule	Required showing
Same site	Use the same parcel boundary and survey base.
Same constraints	Map wetlands, flood zones, soils, utilities, drainage, easements, buffers, setbacks, and topography.
Same engineering level	Provide a signed or sealed concept—not gross-acreage multiplication.
Same output measures	State net lots or floor area, roads, trips, students, utility demand, fire flow, and buildout.
Same agency review	List reviews, approvals, and improvements still required.
Same financial reality	Disclose infrastructure obligations under each scenario.

Without a comparable plan, current zoning may permit development, but the claimed yield, layout, timing, and feasibility remain unproven. That is ordinary decision discipline—not hostility.

The key distinction

The choice is the requested entitlement versus lower-intensity RA rules and full review—not development versus none. Any lawful RA project is the result of existing zoning, not a reason to grant greater entitlement without proof.

What conditions can and cannot do

- Conditions can bind a site plan, buffers, internal sidewalks, phasing, and lawful applicant-consented impact measures.
- Conditions cannot create school seats, finish a bridge, commission utilities, fund widening, or prove system capacity.
- For Sweetbriar, the Board may continue the hearing to seek measurable, capacity-linked conditions.
- For Brown, conventional CB has no project-specific conditions; evaluate the district’s full use range, not a nonbinding statement of intent.

Record basis R20 and R21. This section is a policy and evidentiary argument, not legal advice. Any motion or condition should be reviewed by the County Attorney.

Decision Language for Consideration

North Carolina law requires a consistency statement and a reasonableness analysis when a zoning map amendment is adopted or rejected. The following language is offered for refinement by the County Attorney.

CREZ 2026 00005 Sweetbriar

Suggested denial rationale

The Board finds that the requested conditional rezoning is not reasonable and is not in the public interest on the present record. Although the future land-use map identifies the area for suburban growth, the staff report finds the request inconsistent with Horizon 2040 Objective 2.4 concerning school coordination; the affected elementary and middle schools are projected above listed capacity; the access-road traffic record and the cumulative effect of nearby approved and pending development are incomplete; and project-specific water, wastewater, emergency-service, and infrastructure timing evidence does not establish sufficient carrying capacity. Maintaining the existing zoning until those matters are documented is a reasonable protection of the surrounding community and does not prohibit development allowed under current law.

PREZ 2026 00009 Harry C Brown

Suggested denial rationale

The Board finds that the requested conventional Community Business rezoning is not reasonable and is not in the public interest on the present record. The staff report identifies inconsistency with Horizon 2040 Objectives 1.2, 2.4, and 4.2 concerning carrying capacity, school coordination, and environmental protection; the cited Queens Creek Road traffic count exceeds the report's estimated LOS D design capacity; the site includes VE and Coastal A flood-hazard areas and no wetlands evaluation was submitted; major bridge and water improvements are scheduled years away; and no binding site plan limits the full range of CB uses. Maintaining Rural Agriculture zoning is reasonable until the site's intensity, impacts, and mitigation can be evaluated against verified capacity.

Alternative continuance direction

If the Board is not prepared to deny, continue each hearing to a date certain and direct staff to return with a joint cumulative-impact memorandum, final agency letters, a complete by-right comparison if that claim will be relied upon, and any applicant-consented capacity-linked conditions.

Record basis R20. County Attorney review is essential before use.

Questions to Ask Before Either Vote

A complete answer should identify the source, date, assumptions, responsible agency, and whether the result is binding.

	Topic	Question
1	Cumulative pipeline	How many approved but unbuilt and pending units use these same schools, roads, pump stations, and emergency districts, and where is that total shown in the staff analysis
2	Schools	Which permanent seats will serve these students on first occupancy, and what funded project creates them if current capacity is exceeded
3	Attendance boundaries	Would assignment changes be required, and what travel or crowding would they shift elsewhere
4	Sweetbrier access	What is the existing and projected peak-hour operation at the actual Sweetbrier Drive access point including Boyington Place
5	Queens Creek Road	What mitigation is justified where the cited count already exceeds the staff report's LOS D benchmark
6	Bridge	What happens during the years before B-5944 construction begins and during construction itself
7	NCDOT commitments	Which improvements are required in writing, who pays, and which conditions survive if NCDOT does not issue the expected permit
8	Wastewater	Is service commissioned, how much capacity is committed, what component is limiting, and what allocation is reserved for this project
9	Water and fire flow	What pressure and fire flow will exist at full buildout, including peak demand and required upgrades
10	Land and drainage	What downstream systems receive runoff; which cumulative developments are modeled; what wetlands work is complete for Brown; and what Flight Path Overlay coordination applies to Sweetbriar
11	EMS and fire	What provider-reviewed demand, fire-flow, response, and unit-availability analysis supports the finding that service capacity is sufficient
12	By-right and public interest	Where is the comparable filed RA plan proving net buildable yield, and what measurable public benefit outweighs the documented capacity conflicts and long infrastructure lead times

A Capacity First Framework

Hubert United is asking for a repeatable process that gives applicants, residents, staff, and commissioners the same information before major entitlements are granted.

Immediate action

- Deny the two September 21 map amendments on the present record or continue them for the evidence listed here
- Require one joint cumulative-impact addendum because both cases use the same school baseline and related infrastructure
- Publish every agency response and calculation before the continued hearing

Near term policy

Element	Recommended rule
Trigger	Residential proposals of 30 or more units and substantial commercial or mixed-use rezonings in constrained service areas
Connected review	Schools, roads, water, wastewater, drainage, fire, EMS, and capital timing analyzed in one standardized addendum
Status discipline	Operational, under construction, fully funded, programmed, conceptual, and unfunded shown as distinct categories
Capacity thresholds	Published measures that trigger phasing, mitigation, plan amendment, continuance, or denial
Proportionate share	Transparent applicant contribution for project-generated needs, with credits only for genuine public improvements
Annual dashboard	Approved units, permits, occupancy, school utilization, traffic, crashes, utility allocations, response measures, and capital status

A balanced growth position

This framework does not promise zero change and does not ask applicants to solve every historic deficiency. It asks that new entitlement be proportionate, transparent, and synchronized with the systems it will use. Projects that bring verified public infrastructure, phase to real capacity, and fit an updated area plan should receive a clearer path. Projects that rely on unbuilt capacity or incomplete analysis should wait.

Methods Limits and Corrections

Credibility matters more than a dramatic number. This packet separates what the records establish from what they do not.

Topic	Treatment in this packet
School arithmetic	Hubert United adds the two staff reports' project estimates to their shared baseline. It does not claim OCS produced the combined total.
School snapshots	The May 2026 capacity report and 2026–27 staff-report projections use different dates and measures. They are shown separately.
Countywide versus local	A countywide apparent seat surplus is not treated as available capacity in the eastern attendance cluster.
Traffic counts	Every AADT and design-capacity value is tied to its cited station. Values from different segments are not merged.
Crash counts	The NCDOT email and formal overview differ by one crash. Both are disclosed; no causal claim is made.
Utilities	Pipe presence is not equated with available capacity. No exact uncommitted capacity is asserted.
Webb Creek report	The report's printed average-flow value and percentage do not reconcile; this packet does not calculate a percentage from them.
Future projects	A forecast, concept schedule, programmed year, and completed facility are not treated as equivalent.
Environmental effects	The packet identifies mapped and documented conditions but does not claim a project-specific flood or wetland outcome without engineering.
Legal statements	Statutory text is cited, but proposed motion language and conditions require County Attorney review.

How uncertainty should affect the vote

Uncertainty does not prove that a system will fail. It does mean the record has not carried the burden of showing that a discretionary increase in entitlement is reasonable and in the public interest.

Closing Request

Growth should follow capacity. It should not become the reason taxpayers must race to repair predictable deficits after approvals are already permanent.

Hubert and eastern Onslow have absorbed sustained residential growth while the bridge, road, school, utility, drainage, fire, and EMS systems move on different timelines. The September 21 record does not demonstrate that those timelines are aligned for either request. It demonstrates the opposite: existing school deficits, a road-capacity warning, long-delayed capital projects, and unresolved project-specific service questions.

We respectfully ask each Commissioner to evaluate the full entitlement being requested, the cumulative service area, and the evidence actually in the record—not an assumed future improvement and not an untested statement that the same project will happen anyway.

Please deny CREZ-2026-00005 and PREZ-2026-00009. If more evidence is needed, continue the hearings and require it before—not after—the County increases development rights.

Then please begin a focused update for 28539 and eastern Onslow so that future applicants, residents, staff, and the Board can work from a plan that matches today's pipeline, today's infrastructure, and a realistic capital schedule.

Hubert United commitment

We will continue to distinguish verified facts from analysis, disclose conflicts in the record, acknowledge completed public investments, and support growth where the evidence shows that public systems can carry it.

Thank you for your service and your careful consideration

HUBERT UNITED

Record Key

Primary government records are listed first. Hubert United materials are identified as secondary syntheses and are not substituted for agency records.

R1 Onslow County Planning Board Agenda, August 6, 2026

Confirms case numbers, parcels, acreage, applicants, zoning requests, locations, and future land-use categories. [Open source](#)

R2 Onslow County staff report for CREZ-2026-00005 Greene Sloan Conditional Rezoning

Official case facts, concept, conditions, school table, roads, utilities, wetlands, overlays, public comments, and Horizon 2040 analysis. [Open source](#)

R3 Onslow County staff report for PREZ-2026-00009 Harry C Brown Family Rezoning

Official case facts, CB district implications, school table, traffic, capital projects, flood zones, utilities, and Horizon 2040 analysis. [Open source](#)

R4 Onslow County Schools Capacity Report, May 29, 2026

Permanent and mobile-inclusive capacity, current ADM, and utilization by school. [Open source](#)

R5 Onslow County Schools Membership Forecast Report, May 5, 2025

Enrollment forecasts and methodology context. [Open source](#)

R6 Onslow County Schools Future Construction Proposal, 2025

Planned housing by area and proposed school construction needs, costs, sizes, and concept dates. [Open source](#)

R7 Onslow County Schools Long Range Facility Needs Assessment

Historical facility needs and capacity-planning context; used only as dated background. [Open source](#)

R8 NCDOT current State Transportation Improvement Program

B-5944 funding and 2031 right-of-way and utilities and 2033 construction schedule. [Open source](#)

R9 NCDOT B-5944 Conceptual Study Report, June 3, 2025

Bridge condition, alternatives, selected concept, length, and traffic-maintenance context.

R10 NCDOT correspondence concerning B-5944, May 4, 2026

Confirms selected alternative and preliminary-engineering status.

R11 NCDOT NC 24 at Queens Creek Road crash overview and agency correspondence

Five-year crash summary; formal overview and email differ by one crash.

Record Key Continued

R12 ONWASA 2025 Annual Wastewater System Report

Permitted capacity, flows, projects, and violations for the Swansboro and Webb Creek facilities. [Open source](#)

R13 ONWASA Projects of Interest

Highway 24 wastewater transmission project scope, cost, contract and construction dates, and target completion. [Open source](#)

R14 Onslow County Commissioners Adopt FY27 Budget, June 30, 2026

Three new EMS stations, new positions, and public-safety investment. [Open source](#)

R15 Onslow County Community Paramedics Expand Services, September 18, 2025

Mobile Integrated Health and ambulance-availability rationale. [Open source](#)

R16 Onslow County Adopts Stormwater Resolution, December 3, 2025

County recognition of growth-related runoff and low-impact development practices. [Open source](#)

R17 Onslow County Zoning Ordinance Article 7

District purposes and permitted intensity including R-8M and CB. [Open source](#)

R18 Onslow Horizon 2040 Land Use Plan

County comprehensive and CAMA land-use plan and its role in zoning decisions. [Open source](#)

R19 Onslow County 2025–2030 Strategic Plan and infrastructure resiliency study

Growth-to-capacity policy and the interdependence of water, wastewater, energy, and transportation. [Open source](#)

R20 North Carolina General Statutes 160D-605

Consistency and reasonableness statements for zoning-map decisions and relevant public-interest factors. [Open source](#)

R21 North Carolina General Statutes 160D-703

Conventional and conditional districts and limits on site-specific conditions. [Open source](#)

R22 Onslow County Board of Commissioners meeting calendar

Confirms September 21, 2026 meeting at 6:00 PM at 234 NW Corridor Boulevard. [Open source](#)

R23 Onslow County staff report for CREZ-2026-00002 Starling Cove and July 20, 2026 Board materials

Prior eastern Onslow case context, school and infrastructure analysis, and the distinction between theoretical RA yield and a filed plan.

R24 Hubert United schools and transportation research dossiers

Secondary synthesis, source routing, calculations, and disclosed limitations. [Open source](#)

R25 Mailed public-hearing notices dated September 1 and September 9, 2026

Confirms the two proposed rezonings and September 21 public-hearing time and location.

Prepared for the public record

This packet was prepared from records available through September 15, 2026. If the official September 21 agenda, revised staff reports, applicant conditions, or agency letters change, the case-specific facts should be updated before submission.