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University Corporate Center (28403)
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October 27, 2025

VIA EMAIL

The Town of St. James
c/o Jeff Repp, Town Manager
4140-A Southport-Supply Road
St. James, NC 28461
jrepp@stjames.town

RE: Supplement and Amendment to Initial
Conditional Zoning and Conditional Rezoning
Applications

Our File 211659-00002

Dear Jeff:

Please consider this Supplement as an update and supplement to the Initial Conditional Zoning Application ("Initial Zoning Application") and the Conditional Rezoning Application ("Rezoning Application") (collectively, the "Applications") submitted by Ward and Smith, P.A. ("Applicant") on behalf of the Town of St. James, Harbor Development Corp., Canal Associates, LLC, and D. R. Development Corporation (collectively, "Owner") on October 20, 2025. Where any terms in this Supplement contradict the terms of the Applications, this Supplement shall control. Capitalized terms not defined in this Supplement shall have the same meaning as defined in the Applications.

In connection with discussions with Town Staff, the Applicant hereby updates the Applications to replace the Concept Plan submitted as Exhibit C on both Applications with the updated Concept Plan attached hereto as Exhibit 1. For the avoidance of doubt, the Concept Plan attached as Exhibit C on both the Initial Zoning Application and the Rezoning Application is hereby deleted in its entirety (on both Applications) and replaced (on both the Initial Zoning Application and the Rezoning Application) with the Concept Plan attached hereto as Exhibit 1.

Please do not hesitate to reach out with any questions.

Yours truly,



Samuel B. Franck

Enclosures

The Town of St. James
October 27, 2025
Page 2

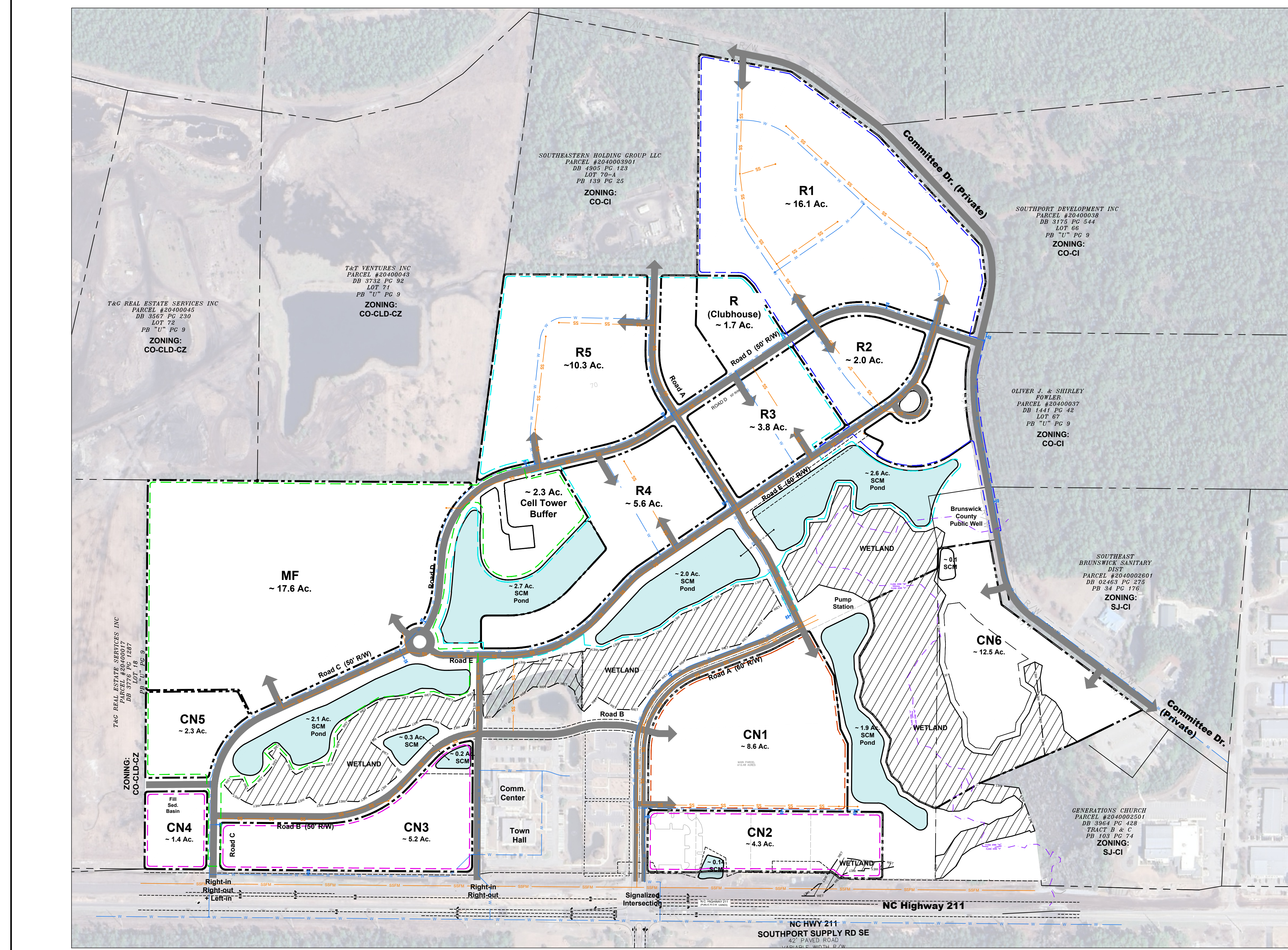
Exhibit 1
Updated Concept Plan

[Attached]

EXHIBIT D
Conditions to Conditional Zoning of the Property

As used herein, "Developer" shall mean the applicable owner(s) of the Property, and their successors and assigns. Notwithstanding the Town of St. James Code of Ordinances, including without limitation, the Unified Development Ordinance ("UDO"), the following conditions and requirements shall apply to the Property:

- Consistency with Concept Plan.** The Development shall be generally consistent with the Concept Plan attached as Exhibit C, subject to the terms of this Exhibit D and any Development Agreement entered into between the Town and the Developer. All uses compliant with the foregoing shall only be reviewed by the Town at a staff level by the UDO Administrator, Planning Board and/or Town Council review and approval of subsequent site plans for uses that are consistent with the Concept Plan shall not be required.
- Flexibility in Development.** So long as the overall residential unit count does not exceed 1,902 units, the Developer may alter the type and location of uses within the Property without the need for additional approval from the Town (including the Town Planning Board and Town Council).
- Sales and Marketing.** The Developer shall be allowed to organize, sponsor, host, and undertake various sales, marketing, community, and special events. Without limitation, the Town shall allow the Developer to maintain construction and sales offices associated with the Development.
- Parking Space Width/Drive Aisles.** Notwithstanding UDO Section 9.1.5(E), the minimum width of standard 90-degree parking spaces shall be reduced from ten feet (10') to nine feet (9') throughout the Project. Additionally, minimum drive aisle width is twenty-four feet (24') wide for 90-degree parking.
- Parking Area Interior Landscaping.** Notwithstanding UDO Section 10.9.3(C), the requirement for a ten-foot (10') landscaped median every one hundred thirty feet (130') within parking areas exceeding forty thousand square feet (40,000 SF) shall not be applicable. The Developer shall not be required to provide such landscaped medians within parking areas exceeding 40,000 square feet.
- Street Buffer Widths.** Notwithstanding UDO Sections 10.8.8 and 10.8.9, the required street buffer widths along Collector, Thoroughfare, and Arterial streets shall be reduced from twenty feet (20') to ten feet (10'), provided that the buffer area shall remain landscaped consistent with the intent of the UDO.
- Street Right-of-Way Width.** Notwithstanding UDO Section 12.8.1(C)(1)(a), the minimum right-of-way width for Collector streets shall be reduced from seventy feet (70') to sixty feet (60'), and the minimum right-of-way width for all other streets shall be reduced to fifty feet (50').
- Uniform Setback Standards for Attached Residential Dwellings.** Notwithstanding the definitions and dimensional requirements otherwise applicable under the UDO, duplex, triplex, and quadplex residential buildings within the Development shall be subject to the same setback requirements as single-family attached dwellings. Accordingly, such structures shall be permitted a minimum side setback of five feet (5') and a minimum separation of twenty feet (20') between principal buildings.
- Multi-Family Parking Requirements.** Notwithstanding the requirements of UDO Section 9.1.6, which mandate two (2) parking spaces per dwelling unit plus three (3) additional spaces per multi-family structure (including triplexes and quadplexes), the Development shall provide parking for multi-family residential units at a minimum ratio of one and eight-tenths (1.8) spaces per dwelling unit.
- Single-Family and Duplex Parking Requirements.** Notwithstanding the provisions of UDO Section 9.1.6 requiring two (2) parking spaces per dwelling unit, parking spaces that are provided within garages or otherwise integral to the principal residential structure shall be counted toward the minimum required parking space count.
- Commercial Parking.** Notwithstanding Section 9.1.6 of the UDO, with regard to the commercial areas of the development, the minimum parking required for all uses is one (1) space per two hundred square feet (200sf) of gross enclosed floor area. Additionally, there is no maximum parking requirement for the commercial areas.
- Minimum Lot Width and Corner Lot Standard.** Notwithstanding UDO Section 12.7.3(E), the minimum lot width for single-family detached lots within the Development shall be forty feet (40'). The Town agrees that corner lots shall not be required to increase to one and one-half (1.5) times the minimum required lot size, provided that all such lots maintain adequate building envelopes and comply with the applicable front and side setback requirements established for the zoning district.
- Stormwater Management Standards.** The design and construction of the stormwater management system for the Development shall be in compliance with NCEQ Water Quality Regulations and the Brunswick County pre-development/post-development Stormwater attenuation for the two (2) year, ten (10) year, and twenty-five (25) year storms as those standards existed as of the date of approval of the PUD Concept Plan for Canal Assoc./Harbor Development Corp. by Timothy G. Clinkscales at Paramounte Engineering dated December 27, 2017 and approved by the Brunswick County Planning Board on January 8, 2018 ("PUD Plan"). Compliance with the foregoing standards shall be deemed to satisfy the Town's stormwater management requirements for the Development.
- Tree Preservation and Timbering Activities.** The Development shall not be subject to any tree preservation standards or similar requirements, including, without limitation UDO Section 10.3, 10.4, and 10.10. Accordingly, the Developer shall be permitted to conduct timbering and clearing activities on the portions of the property to be developed prior to commencement of construction without the need for any approvals from the Town.
- Wellhead Protection Areas.** The Parties acknowledge that Brunswick County will provide public water and wastewater utility service to the Development. The Development shall comply with any wellhead protection regulations or restrictions imposed by Brunswick County or the NCDHEQ as of the date of approval of the PUD Concept Plan for Canal Assoc./Harbor Development Corp. by Timothy G. Clinkscales at Paramounte Engineering dated December 27, 2017 and approved by the Brunswick County Planning Board on January 8, 2018 ("PUD Plan"), and that compliance shall be deemed sufficient to satisfy any similar requirements of the Town.
- Building Facade Design (UDO Section 9.4).**
 - Facade Orientation and Enhancement.** Notwithstanding the requirements of UDO Section 9.4(C), only those facades directly facing a public street right-of-way that functions as a primary front building, any grocery store use shall be permitted to install four (4) wall signs.
 - Wall Signage - Retail, Restaurant and End-Cap Buildings.** Multi-tenant buildings three (3) stories or less shall be permitted one (1) wall sign per tenant, consistent with UDO Section 11 standards. End-cap tenants and freestanding commercial buildings (other than the grocery store described above) shall be permitted wall signage on up to three (3) building elevations, provided that the combined area of all wall signage on a given building does not exceed ten percent (10%) of the designated primary wall area.
 - Freestanding Monument Signs.** The Development shall be permitted at least three (3) freestanding monument project signs along Highway 211, including one at each entrance, subject to minimum separation of five hundred feet (500'). Each monument sign may contain up to one hundred ten (110) square feet per side and a total height not to exceed eighteen feet (18'). Additionally, at least one (1) freestanding monument sign shall be allowed on Committee Drive not to exceed ten (10) feet in height and forty-five (45) square feet of sign area per side.
 - Separate monument signs** shall also be permitted on each commercial outparcel, each sign not to exceed ten (10) feet in height and forty-five (45) square feet in area per side.
- Lighting Fixture Heights.** In accordance with UDO Section 15.1.5.3, lighting fixtures located within parking areas may have a maximum height of forty feet (40'). Fixtures within non-vehicular pedestrian areas shall have a maximum height of fifteen feet (15'). For purposes of this standard, "non-vehicular pedestrian areas" shall mean sidewalks, plazas, or other areas primarily intended for pedestrian use and not used for vehicle access or parking. Interior design aisles serving retail buildings shall be considered vehicular areas for lighting purposes.
- Site Lighting for Commercial Areas.** Notwithstanding the UDO, the following design criteria may apply to the commercial areas of the Property, in Developer's sole discretion:
 - All shopping center lighting may be LED, at the option of Developer.
 - Developer shall be allowed a minimum foot-candle level at any location in the shopping center of 3 foot-candles LED (minimum maintained).
 - At Developer's option, maximum to minimum ratio to be no greater than 5:1 for LED, with no point greater than 15 foot-candles.
 - At Developer's option, maximum average to be no greater than 6.0 foot-candles.
 - Site lighting design may utilize fixture/lamp manufacturer's design criteria.
 - LED site lighting optics may utilize "reduce glare optics" and shields.
 - LED fixtures may utilize 4000° K cooler temp.
 - At Developer's option, fixture mounting height to be no higher than 35 feet.



Concept Plan D
Scale: 1" = 200'

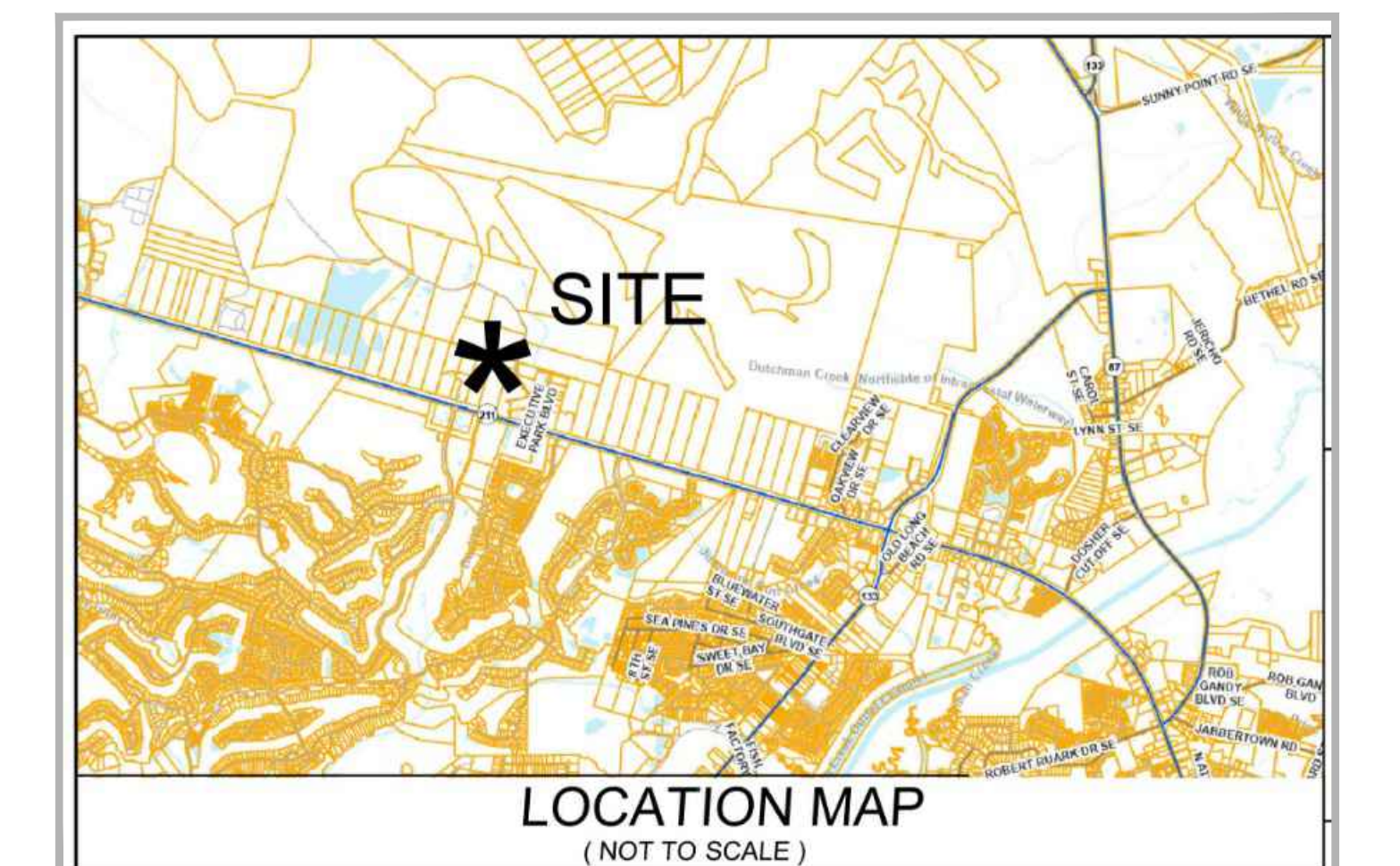
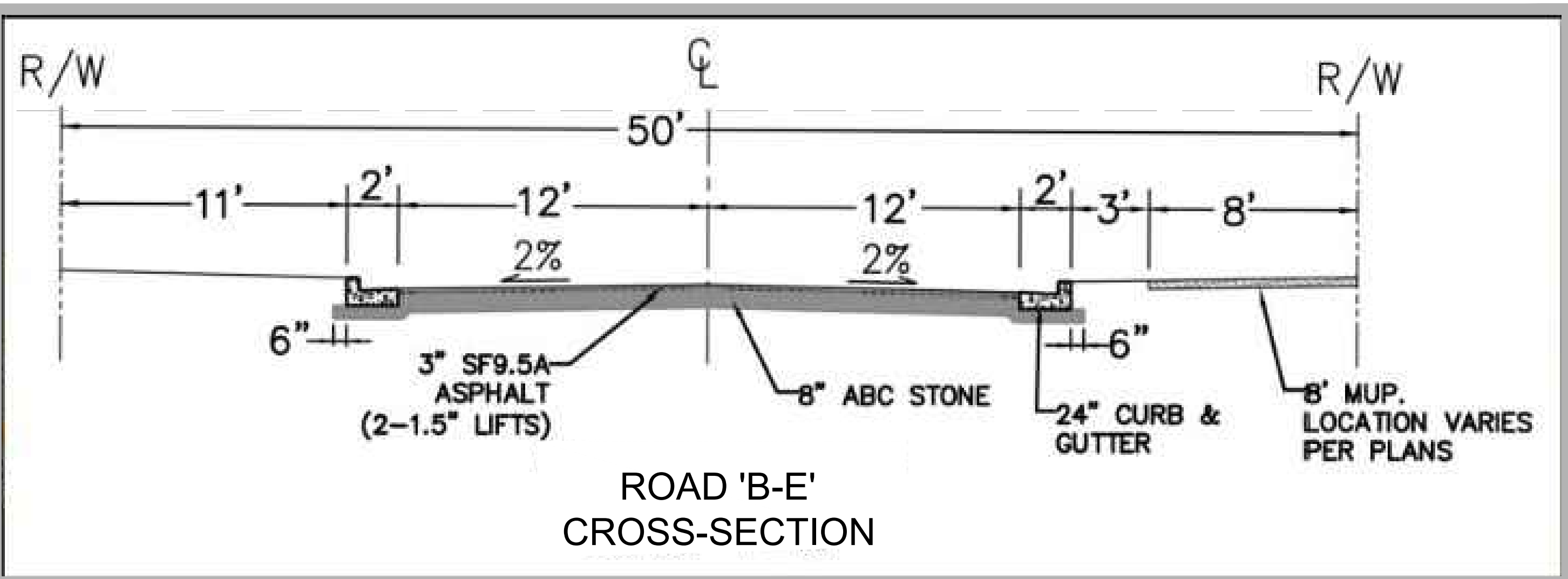
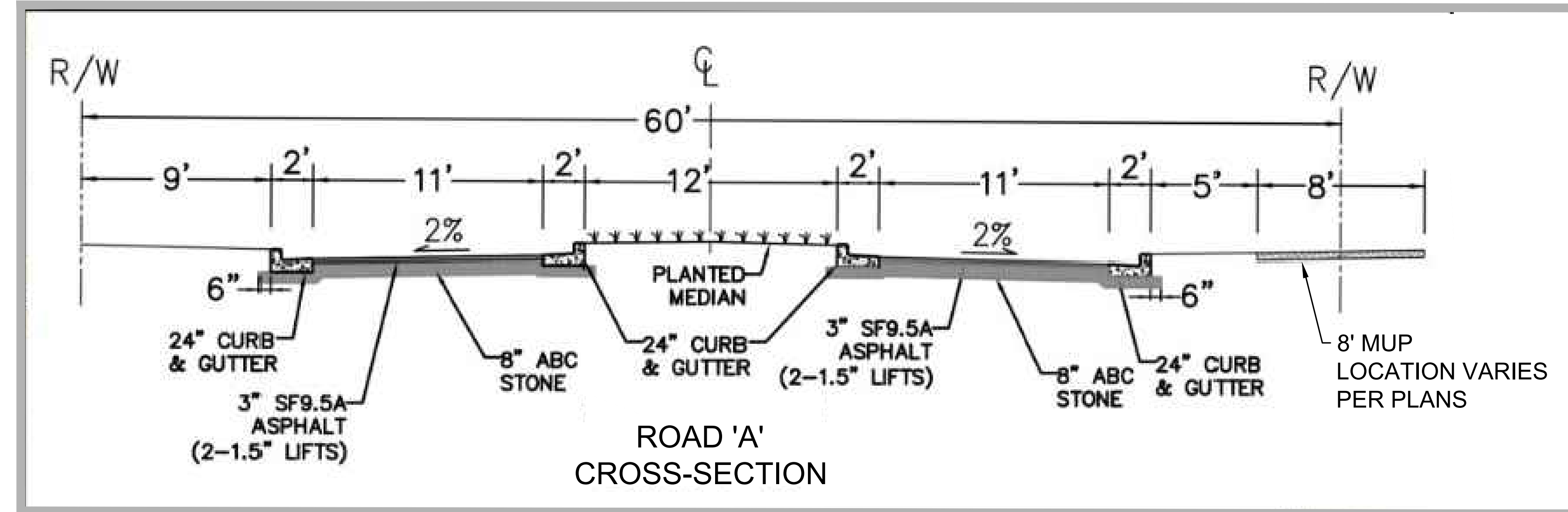
Site Data	
Property Owner	Harbor Development Corp ETALS Canal Associates LLC D.R. Development Corporation
Site Address	Southport Supply Road
PIN #	20400018, 20400019, 20400020, 20400040, 20400039, 20400025, 20400024, 20400023, 2040002201, 20400022, 20400058, 2040002502, 2040002101
Area	142.03 AC
Existing Zoning	Brunswick County - Commercial-Low Density (CO-CLD), Commercial Intensive District (SI-CI), Commercial Low-Density District (SI-CLD)
Proposed Zoning	Creative Zoning Conditional District (CZ-CD)
Proposed Maximum Density	1,902 Units
Estimated Population Density Range (over total acreage)	10 people/acre to 28 people/acre
Estimated Densities per Type of Use	
Multifamily Area	Potential range from 10 units/acre to 29 units/acre
Cumulative Estimated Density for other Residential Areas	Potential range from 12 units/acre to 36 units/acre
Cumulative Estimated Density Among all Commercial Areas (gross square footage/acre)	Potential range from 21,865 gs/acre to 34,986 gs/acre
Recreation Space Required	14.2 Acres
Active	3.55 Acres
Passive	10.65 Acres
Street Perimeter Buffer	10' Buffer to Collector and Thoroughfare Street R/W
Development Perimeter Buffer	None Required
Connectivity Ratio	0.60

Multi-Family Standards	
Minimum Number of Acres	5 Acres
Lot Size	
Minimum Lot Dimensions	None
Frontage for the First Structure	75' and 20' per additional unit up to a total of 135'
Setbacks	
Front Yard	25'
Rear Yard	20'
Side Yard	20'
Street Side Yard	15'

All Residential Standards, Except Multi-family		
	Townhouse	Single-Family
Minimum Lot Dimensions (SF)	2,200 SF	5,000 SF
Frontage at the Setback Line	40'	22'
Frontage at the Setback, Corner Lot	20'	35'
Frontage in a Cul-de-sac (Curb Width)	20'	20'
Setbacks		
Front Yard	20'	12'
Rear Yard	15'	10'
Side Yard	10'	5'
Side Interior (Attached/Duplex/Zero Lot Line)	0'	0'
Side Exterior (Attached/Duplex/Zero Lot Line)	5'	5'
Corner Side Yard	5'	5'

Commercial Neighborhood Standards		
Minimum Lot Area (SF)	15,000 SF	
Frontage at Setback Line	100' (120' for Corner Lots)	
Setbacks		
Front Yard	25'	
Rear Yard	6'	
Side Yard	10'	
Street Side Yard	25'	

- At Developer's option, individual wattage per head to be no greater than 10W per foot of above ground pole height.
- Parking lot lighting may be controlled by timeclock/photocell means, rather than wireless control systems, remote, proprietary or lease controls.
- A 1" conduit with pull string, may be routed from the house panel site lighting controls to the electrical room EMS panel.
- Parking lot lighting may be powered via 208c (not 480v).
- Parking lot lighting may have ground mounted hand hole (rated for application at each pole).
- Parking lot poles may be direct bury concrete poles.
- Parking lot lighting poles may include break away fuses at each pole.
- Parking lot lighting poles in parking field may utilize impact protection such as Kellamy are formed with yellow band.
- Double Frontage Lots.** Notwithstanding Section 12.7.3.D of the UDO, double frontage residential lots shall be permitted along Committee Drive.
- Connectivity Ratio.** Notwithstanding Section 12.7.10.D of the UDO, the minimum connectivity ratio shall be 0.60 for the Development.
- Maximum Height for Commercial Areas.** The maximum height permitted is 60' for all principal commercial buildings; however, for each additional two (2) feet of setback added, an additional one (1) foot in height can be added to said maximum.



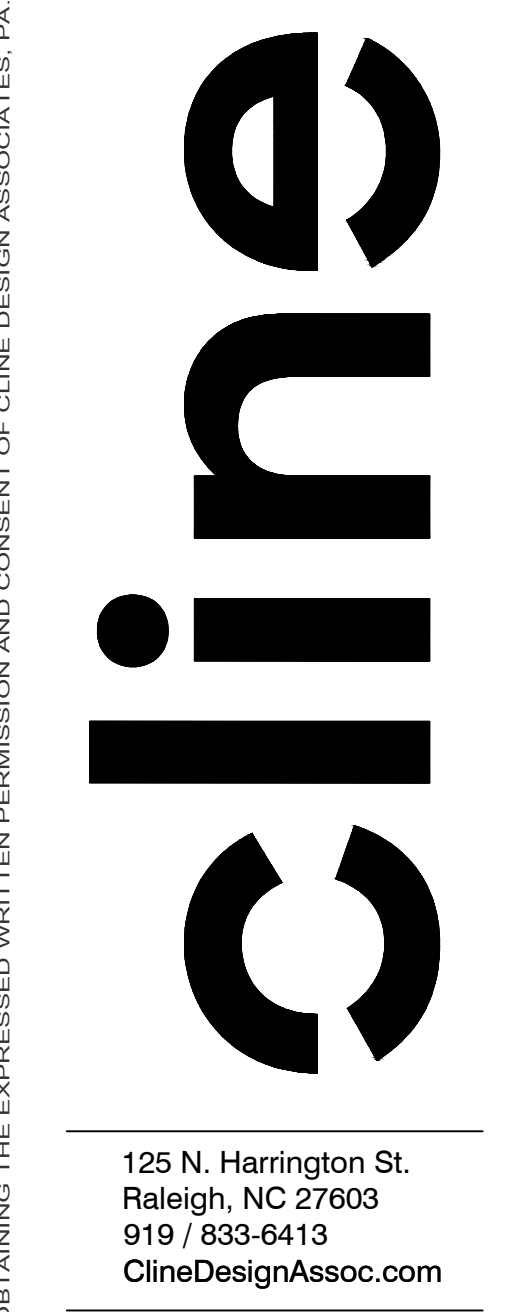
Estimated Phasing (subject to change - actual construction schedule not bound by these estimates):	
Multifamily areas:	Construction begins around 2027 and completion around 2031
Other residential areas:	Construction begins around 2026 and completion around 2030
Commercial areas: CN1 and CN2: CN3, CN4, CN5, & CN6:	Construction begins around 2026 and completion around 2030 Construction begins around 2026 and completion around 2032

Conditions & Notes F
Scale: 1" = 100'

Estimated Phasing E
Scale: 1" = 100'

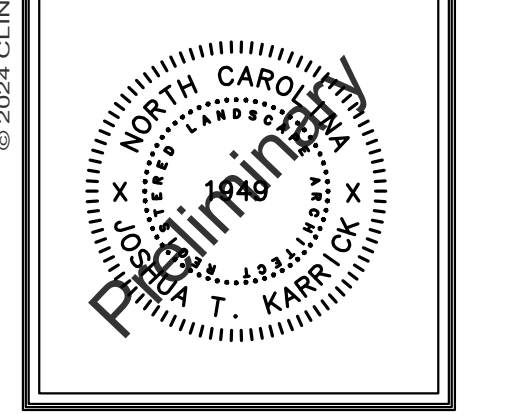
Roadway Sections C
Scale: 1/4" = 1'-0"

Key Map A



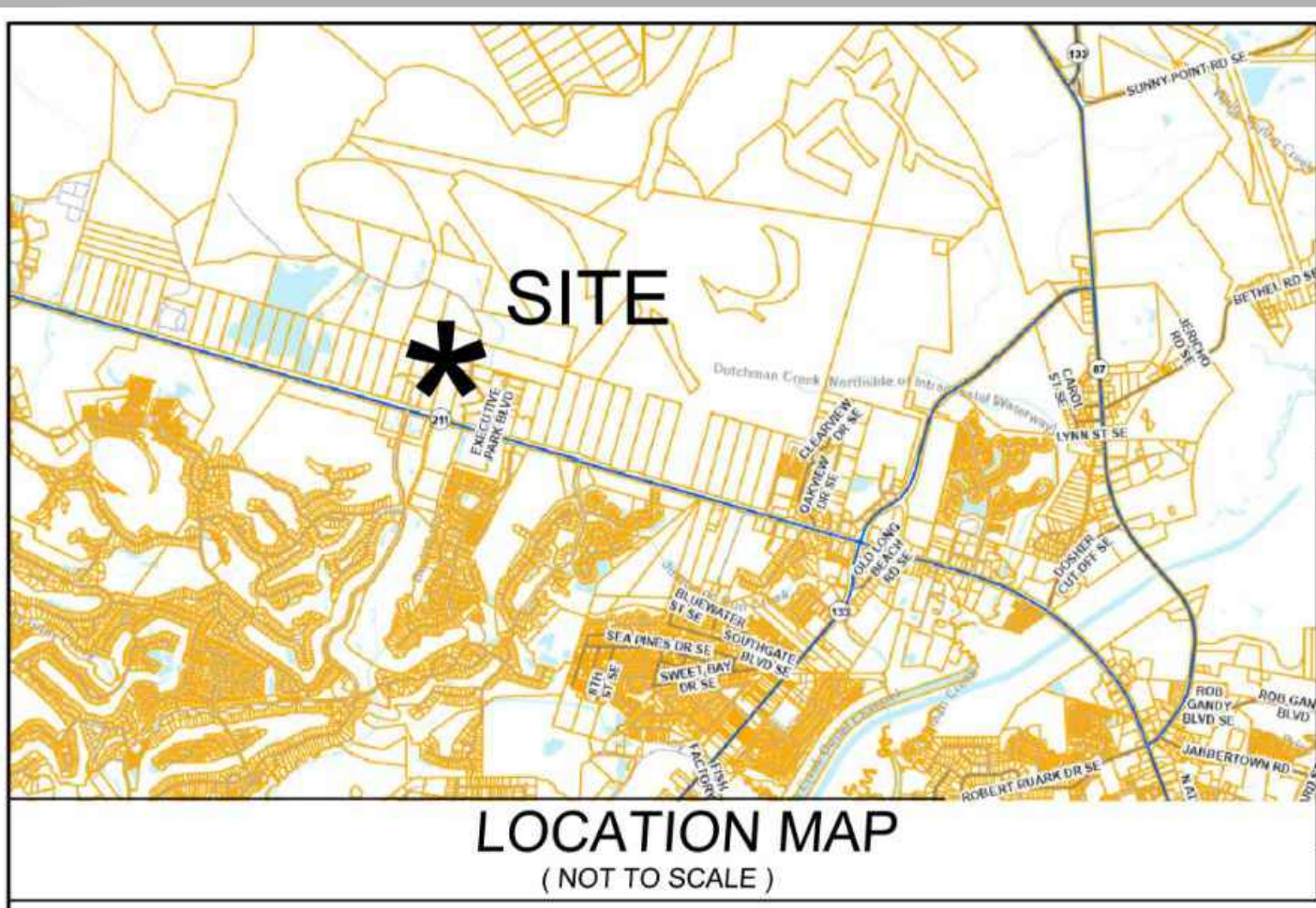
Tunstall Consulting Engineers PLLC
125 N. Harrington St.
Raleigh, NC 27603
919.833.6413
ClineDesignAssoc.com

St. James North Tract
BRUNSWICK COUNTY, NORTH CAROLINA

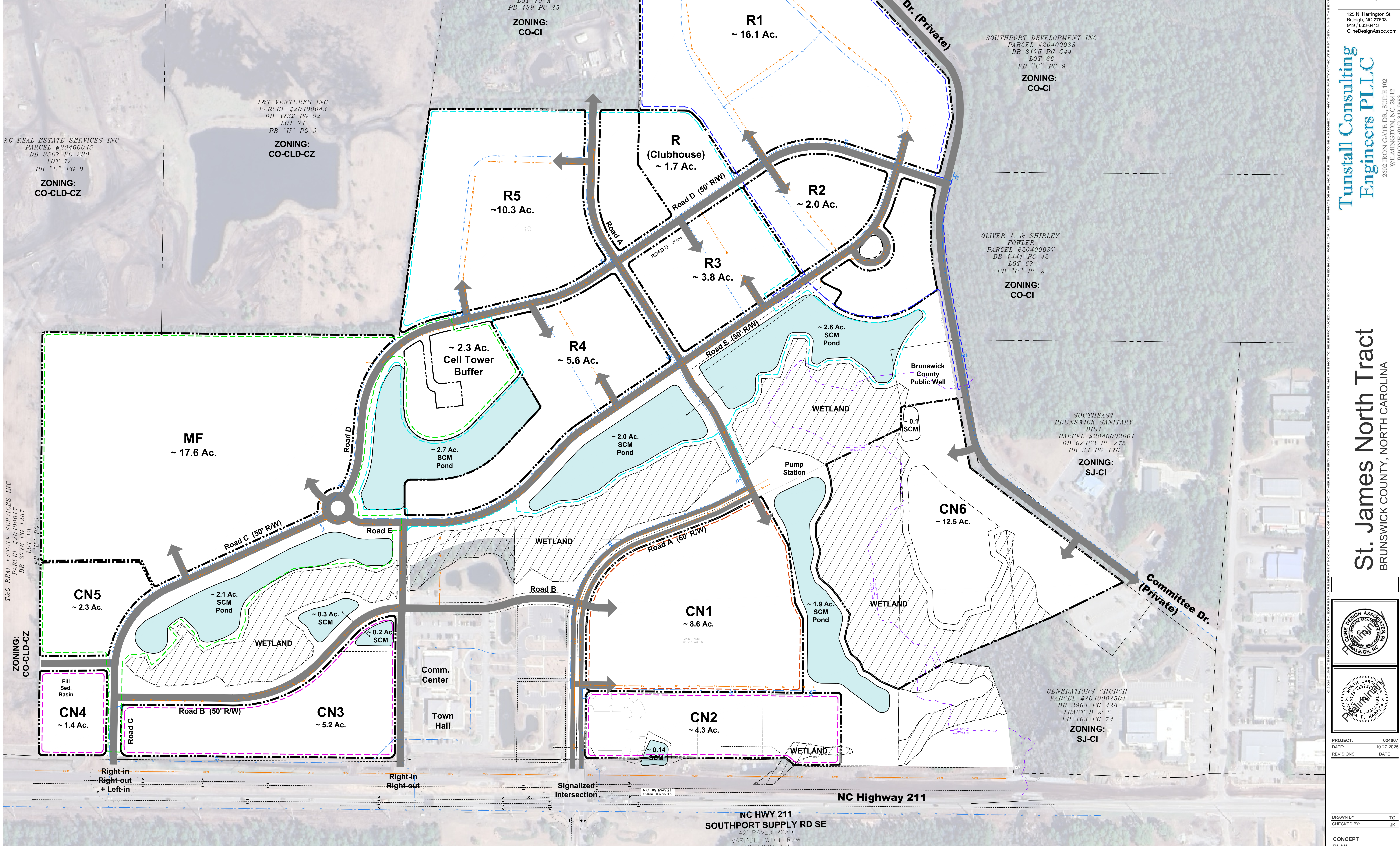


PROJECT:	024007
DATE:	10.27.2025
REVISIONS:	[DATE]
DRAWN BY:	TC
CHECKED BY:	JK

CONCEPT PLAN
CP100



LOCATION MAP
(NOT TO SCALE)



T&C REAL ESTATE SERVICES INC
PARCEL #20400017
DB 3776 PG 1287
LOT 18
PB "U" PG 9
ZONING:
CO-CLD-CZ

T&T VENTURES INC
PARCEL #20400043
DB 3732 PG 92
LOT 71
PB "U" PG 9
ZONING:
CO-CLD-CZ

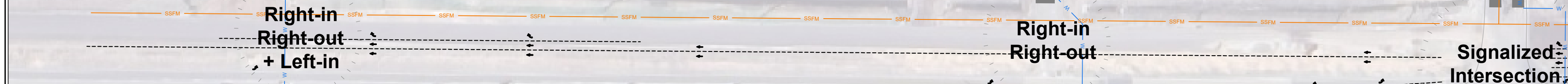
SOUTHEASTERN HOLDING GROUP LLC
PARCEL #2040003901
DB 4905 PG 123
LOT 70-A
PB 139 PG 25
ZONING:
CO-CI

SOUTHPORT DEVELOPMENT INC
PARCEL #20400038
DB 3175 PG 544
LOT 66
PB "U" PG 9
ZONING:
CO-CI

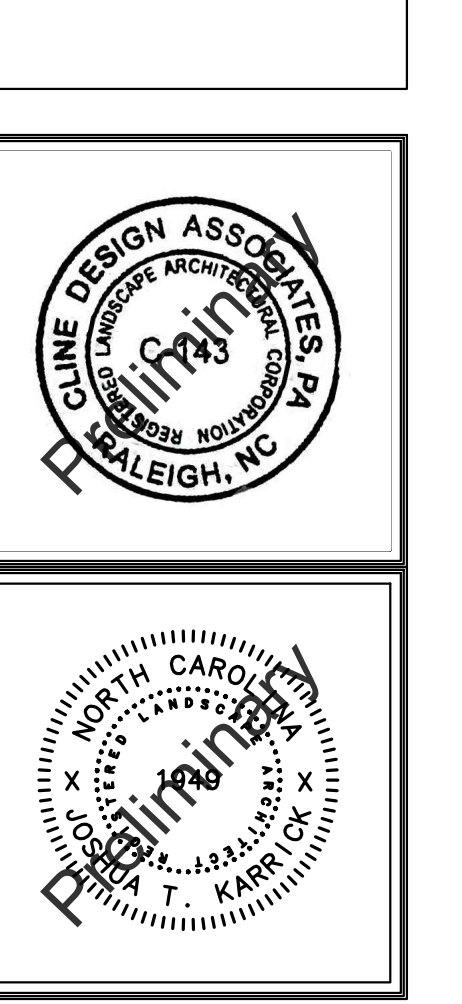
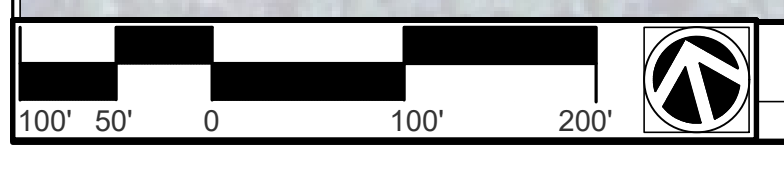
OLIVER J. & SHIRLEY
FOWLER
PARCEL #20400037
DB 1441 PG 42
LOT 67
PB "U" PG 9
ZONING:
CO-CI

SOUTHEAST
BRUNSWICK SANITARY
DIST
PARCEL #2040002601
DB 02463 PG 275
PB 34 PG 176
ZONING:
SJ-CI

GENERATIONS CHURCH
PARCEL #2040002501
DB 3954 PG 428
TRACT B & C
PB 103 PG 74
ZONING:
SJ-CI



NC HWY 211
SOUTHPORT SUPPLY RD SE
42' PAVED ROAD
VARIABLE WIDTH R/W
AS SHOWN ON
NC DOT PROJECT R. 5031



PROJECT:	024007
DATE:	10.27.2025
REVISIONS:	[DATE]

DRAWN BY: TC
CHECKED BY: JK

CONCEPT
PLAN