Making Comprehensive Planning Relevant: Raleigh’s 2030 Comprehensive Plan

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This article explores the relevance of the planning profession and the value of comprehensive plans as an effective planning tool, through a single case study: Raleigh’s recently adopted 2030 Comprehensive Plan. The plan is simultaneously a blueprint for the future and a forum for an ongoing discussion about the future of Raleigh. The plan achieved these outcomes by virtue of the process that created it, the framework under which it is implemented, and the standing commitment to keep the plan current and accountable over time. Raleigh’s success story with the adoption of the 2030 Comprehensive Plan highlights the role of comprehensive plans in guiding communities towards long-term success.

The urban planning profession suffers from a long-standing identity crisis. In planning programs across the nation, degree candidates begin their first semester with a course in Planning Theory, which they quickly discover is concerned less with theories of good planning and more with questioning fundamental legitimacy of the field. They then branch out into a field of study so diffuse that it lacks an identifiable core curriculum. It is entirely possible to graduate with a Master’s degree in Planning without a thorough understanding of zoning law, how to develop a site plan, or the rudiments of transportation planning. Having left behind its focus on physical planning, the field is now so broad in terms of its scope that it is increasingly difficult to explain what its practitioners actually do.

The comprehensive plan is one of the oldest tools in the contemporary planner’s toolbox. The goal of comprehensive planning—to guide the growth of an entire community over a multi-decade timeframe—is at once audacious and, to the critics of planning, a prime example of planners’ hubris. If comprehensive planning can be made relevant, then perhaps there is hope for the profession after all.

This article first explores the case for Comprehensive Planning, drawing in part from a recently published American Planning Association Planning Advisory Service report titled Sustaining Places. Next, common criticisms of comprehensive planning are addressed. The article then transitions to a discussion about the City of Raleigh, beginning with a brief history of comprehensive planning there, followed by a detailed examination of the process of creating Raleigh’s 2030 Comprehensive Plan from both a technical and participatory point of view. The last section concludes by showcasing the comprehensive plan as an important document that will have a significant impact on future growth patterns in the city, and with proper maintenance, will remain relevant for years to come.

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The Case for Comprehensive Planning

The case for comprehensive planning rests on three pillars: the Standard City Planning Enabling Act (SCPEA) of 1928, the public provision of infrastructure, and the need to provide a consistent policy framework across political cycles.

Zoning, the first pillar, is the primary legal tool local governments use to shape land use and implement the goals set forth in the comprehensive plan. The original enabling act of 1928 for zoning, promulgated by the U.S. Chamber of Commerce and the starting point for most land use statutes nationwide, states that “zoning should be drawn in accordance with a comprehensive plan.” While the case law interpretation of this phrase varies from state to state, and some states have gone further than this in linking planning and zoning, the intent is clear—zoning grows out of a larger, comprehensive policy framework.

The second pillar, which distinguishes a comprehensive plan from a simple land use plan, is the inclusion of various “system” elements which relate to physical development such as transportation, water and sewer utilities, housing, natural resources and systems, etc. Ideally the land use element of the plan is coordinated with the carrying capacity of the community and plans for the future provision of infrastructure. The coordination of public investment in infrastructure projects—each with long lead times, extensive life spans, and high costs—with private development, is fundamental to comprehensive planning.

The third pillar of support for comprehensive planning is its consistency and applicability over the long term, which promotes policy stability across changing political cycles. Local elected officials are frequently called upon to make discretionary decisions that impact the physical development of a community—whether to fund a particular infrastructure project, grant a special use permit or rezoning petition, or impose impact fees to offset the costs of growth. Elected bodies need technical guidance in making these important independent physical development decisions, which will have cumulative, long-term impacts on the community. The Comprehensive Plan is the technical document which establishes long-range policies for the physical development of the community in a coordinated, unified manner. 1 In the absence of a well-considered and adopted policy framework, such decisions often become popularity contests based on whoever is most effective in turning people out to the official public hearing forum. Because the composition of the governing body may change every few years, grounding decisions in adopted policy can provide a greater level of certainty to private stakeholders in the community that applications in conformance with comprehensive plans are more likely to gain approval.

Beyond the basic pillars of justification outlined above, there are other benefits of comprehensive plans. Since World War II, the federal government has increasingly conditioned financial assistance on conformance with comprehensive plans. They are also a valuable source of information and guidance to private parties involved in the development process; providing greater predictability to the future public investment priorities and to the development process. Finally, comprehensive plans are a resource for those seeking general information on how a particular place may change over the next 20 years, as well as those who want or need to understand how the public sector plans to respond to particular issues and problems. 2

Critiques of Comprehensive Planning

While the intent of this essay is to highlight the significance of comprehensive plans as effective policy documents, it is important to acknowledge their potential limitations. Formal governmental attempts to influence growth and development have always been controversial. It is possible to govern a municipality without a comprehensive plan; many cities have done so, and some planners even recommend it. 3 Much of this critical thinking has its roots in the evolution of planning history. Public and academic attention to planning peaked in the great debate of the 1930s and 1940s between proponents of planning such as Karl Mannheim, Rexford Tugwell, and Barbara Wootton and the defenders of ‘free markets’ and laissez faire such as Friedrich Hayek and Ludwig Von Mises. 4 By the 1950s the debate resolved, resulting in security for planning, and shifting concern and attention to planning techniques and alternative institutional structures. In an alternative view, Lindblom, Wildavsky, and other critics of planning suggest that government actions should not be guided by long range planning or attempts at comprehensive coordination, but by increased reliance on existing political bargaining processes. 5 This view assumed that political competition, like market competition, eliminates the need for independent government action, planning, and coordination. 6 However, several of these traditional and contemporary arguments are much debated and have evolved over time.

Another criticism against comprehensive plans is their long-term focus. Comprehensive plans are typically based on a 20- to 30-year projection of future growth trends. However, it is impossible to construct a reliable forecast over such a time period because of the likelihood of unforeseen events and the fact that the future is seldom a linear continuation of past trends. Imagine the citizens of Raleigh embarking on a “Vision 1950” plan in the summer of 1927. They would have missed the Great Depression and WWII, two major events that changed the trajectory of the nation. New York City planners in the 1970s talked of planned shrinkage as the inevitable response to continued urban decline. They failed to see the dramatic drop in urban crime and resurgent value of a central location to specialized economic activities that would drive a dramatic turn-around in the City’s fortunes.

Thus, the long term perspective of the document makes it a less effective tool to guide day-to-day, short-
term development decisions in the face of dynamic and unforeseen economic and market fluctuations. In such situations, conflicts often arise between the generalized land use recommendations enumerated in comprehensive plans and specific new opportunities presented by changing market forces. If such unforeseen development opportunities were to bring forth larger economic and social benefits, conflicting comprehensive plan recommendations would impede good land use and development decisions, causing loss of economic opportunity for communities keen on attracting growth.

Modern criticism against comprehensive plans is substantiated by a legal provision of the SCPEA. While this planning act served as an impetus to the birth of comprehensive plans around the nation, it also endorsed an ambiguous legal provision upheld by a majority of state courts exempting the adoption of a comprehensive plan as a pre-requisite to the adoption of a zoning law. While several state legislations opted to make the preparation of comprehensive plans either mandatory or conditionally mandatory, a few decided to leave it optional, undermining the legal role of comprehensive plans in implementing zoning law.

Comprehensive Plans are expensive and labor-intensive undertakings. Lacking a legal mandate, many smaller- to mid-sized communities will see no compelling reason to invest their limited staff time, money, and resources into the preparation and maintenance of a comprehensive plan. Rather than being driven by a comprehensive or strategic vision, planning in many of America’s contemporary suburbs is only marginally dedicated to the creation of actual plans and rarely attempts to achieve ambitious public goals. This outcome is often attributed to the lack of resources, political will, and public consensus within the community.

A Brief History of Plan-Making in Raleigh

Raleigh has a long history of making plans for the future, stretching back to the earliest days of the modern planning profession. The City was founded in 1792 to be the capital city of North Carolina. Raleigh’s first plan, the 1792 William Christmas Plan evolved from its natural setting on a high ridge between Crabtree and Walnut Creeks. The Plan provided the basic framework for subsequent city building with urban form as its primary focus. The Plan had a strong central axis of boulevards with the Capital as the focal center, with all streets laid in a north-south grid that divided the city into four quadrants or wards each with a central square. The simple structuring elements of this original plan such as the straight grid, small blocks, and axial streets terminating at the Capital, still exist in the Downtown area with a few modifications, and continue to influence the shape and form of the Capital City. The downtown State Government long range land use plan and other new developments continue to retain the old grid system established by the Christmas Plan.

The “City Beautiful” movement of the early 20th century created a great deal of interest in many cities to prepare plans to guide their future growth. In 1913, the Raleigh Woman’s Club hired Charles Mulford Robinson, a New York landscape architect to prepare a plan for Raleigh. Following the pattern of many City Beautiful era plans, Robinson’s plan for Raleigh primarily addressed appearance without addressing growth, development, or plan implementation. The 1913 plan focused on aesthetic design attributes and suggested elimination of overhead power lines, burial of conduits, inclusion of landscaping, street lighting, parks and open space, and control of building heights. The primary preoccupation was on reducing the impact of the negative imagery of clutter and strip development. However, the recommendations of this plan were not implemented as it was not an officially adopted document and Raleigh had entered into a period of rapid expansion. The same issues explored in this 1913 plan remain relevant even to this day, with only the scope
of the problems and size of the city being different. Unlike many other American cities, Raleigh did not prepare a comprehensive plan in the 1950s or 1960s. By the late 1970s, in response to concerns about the impacts of physical changes occurring in the city, the Planning Commission formed a Comprehensive Planning Committee and the City Council appointed a Citizen’s Committee to prepare a comprehensive plan. These groups, after months of work, and with much citizen involvement, prepared the City’s first comprehensive plan. The 1979 Comprehensive Plan established the document as the official statement of City Council policy concerning primarily the physical development of the City. As was typical of all comprehensive plans of the time, the Plan was comprehensive in content, and long-range and general in outlook. Maintaining and improving the quality of life of Raleigh citizens was the major purpose of the document. The Plan comprised of two major sections: goals and a development guide. The goals were prepared as part of the plan development process, while the development guide contained the official long-range development policy for the City of Raleigh. Also included in the plan were topics such as annexation, transportation, streets, mass transit, bikeways, recreation facilities, greenways, water system renovation areas, waste water, fire protection, solid waste, street lighting, and facilities plans. The 1979 Plan originated much of the planning terminologies which have been in use since then such as neighborhood and community focus areas, policy boundary lines and transition areas. The plan also introduced ten districts and a nodal vision for development, creating non-residential metro ‘focus areas’ along corridor strips and key intersections. The intent of the focus areas was to discourage strip development along corridors and to limit the location and size of retail uses to specific nodes. Each of the ten districts had a land use plan which used the focus area designations and a thoroughfare plan.

Raleigh’s subsequent 1989 Comprehensive Plan, or the Vision 2020 Plan, included amendments to the previous plan which reflected an evolution in policy development. Emphasis shifted towards smaller scale and greater specificity in planning, and more detailed and precise plan recommendations. The document focused more on suburban commercial corridors, retail centers, and area-specific plans in contrast to the more general approach to citywide policies. With time, the plan got longer and more complicated to enforce as the newly adopted plans and policies started conflicting with old elements of the Plan. A major drawback of the Plan was the fact that it did not articulate a set of priority actions to implement the goals, which made monitoring and evaluation of the document difficult. Given these constraints, the 1989 Comprehensive Plan gradually started losing its value and credibility as a blueprint to guide present and future. It should not be surprising that by the mid-to late 2000s, rezoning evaluations often went through a lengthy and contentious process, as parcels under consideration were subject to multiple layers of conflicting land use recommendations ranging from broader district plans and corridor plans to more specific and detailed small area plans. The outcomes of such discussions were influenced by the strength of arguments and interpretations presented by the applicants. It was in this atmosphere that the community, its citizens, elected-officials, and city staff alike agreed that it was time for an update of this important long-range planning policy document.

**Raleigh’s 2030 Comprehensive Plan**

In 2007, the City of Raleigh embarked on a major rewrite of its Comprehensive Plan. The impetus for this undertaking came from professional staff, most importantly the City’s new Planning Director Mitchell Silver, who had joined the City in the summer of 2005. With new leadership came the new energy to rethink and visualize strategies for an updated comprehensive plan document, that would guide Raleigh’s growth into a lasting 21st century sustainable community.

**Initial Goals for the Plan**

The undertaking of a comprehensive rewrite of Raleigh’s Comprehensive Plan was funded by the City Council in 2006. State law at the time had been amended to strengthen the link between planning and zoning. The 1989 Comprehensive Plan, with its internally conflicting policies was not well-suited to serve its purpose of guiding consistency determinations on specific rezoning proposals. A retool was needed.

Beyond this technical fix, however, was the growing sense that the Comprehensive Plan had become excessively long (1,000+ pages) and complicated, and therefore increasingly irrelevant. It no longer communicated clear expectations to citizens and developers as to the City’s policy priorities. People wishing to oppose something could almost always find a justification in the plan because of internal contradictions and lack of clearly identified priorities. When the plan was taken seriously, it was often at odds with new development patterns that were bringing a more urban scale of development to Raleigh.

In drafting the Request for Proposals (RFP) for the 2030 Comprehensive Plan, the City Planning department set forth the goal of a revised plan meeting the following description.5

- Provides greater specificity
- Strives for simplicity and clarity
- Adds new elements
- Addresses the key issues facing the city today
- Tells a compelling, engaging story about the city’s future
- Is supported by current, accurate, and comprehensive data
- Is clearly organized and easy to read
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intended to vet a public review draft of the document. The consultant team was brought to town for these nine meetings, which were held at locations throughout the City both to attract a geographically diverse audience as well as to be convenient to people living and working far from downtown.

In order to provide more outreach, planning staff conducted over 20 small-scale workshops with Citizen Advisory Councils, neighborhood organizations, and organized stakeholder groups. The City’s offer to the public was simple—while City Planning did not have the staff resources or budget to organize these meetings, staff would agree to facilitate a workshop with any group providing a venue and an audience. By answering “yes” to each and every request for a meeting, the City was able to build an inclusive process with a modest investment in staff resources and time.

The public process also had a significant online component. The City used a specialized software product called Limehouse to publish drafts of the new Plan in a web-based, interactive format that allowed the individuals to log comment on the plan at the level of the section, sub-section, or even paragraph. The system was used twice—once internally, for an interdepartmental review, and once publicly, to seek comments on the Public Review Draft of the Plan. Comments were also taken by mail, email, and phone. Some 1,200 comments were logged following the release of the Public Review Draft. All users of the web site could see both the original comments and staff’s responses.

Ensuring Accountability

Citizens reading and commenting on the draft plan or attending a public meeting took their personal time to do so, and accountability and fairness required that their input be taken seriously. Extensive reporting was used to document the process by which staff logged, analyzed, and incorporated public comments into the final Comprehensive Plan.

Both the big public workshops and the smaller, ad hoc workshops resulted in comprehensive reports. The goal for each report was to distill the input into major themes and then state staff’s interpretation of the

Creation of the Planning Process

The consultant selection and contract negotiation process resulted in a planning process that was traditional in format, but enhanced by a number of important and unique features. The process had two parallel tracks: a technical analysis track and a civic engagement track.

The technical track was built around two key documents: a policy audit of the 1989 Comprehensive Plan and other adopted City plans; and an exhaustive data dump and analysis compiled in a Community Inventory Report. These were intended to form the factual and analytical basis for the plan, and were referenced throughout the process.

The policy audit extracted every policy statement and action item from adopted plans and organized them into a spreadsheet. The resulting document, nearly 200 pages in length, revealed over 5,000 policies and actions sitting in the 1989 Comprehensive Plan and related documents. Many of the actions had languished for years, and senior staff members in different departments were surprised to be confronted with adopted actions involving capital projects that they had never seen before.

The civic engagement process was organized around three rounds of three large-format public workshops: an initial round focused on vision and values, a second round for developing policy options, and a third round


- Is graphically attractive, highly visual, and easy to use
- Provides a framework for shaping and managing the City’s future growth
- Maintains a focus on the physical and economic aspects of the city, but also considers the spatial aspects of social issues such as public safety, education, and human services
- Incorporates best practices with regards to urban design, transportation, environmental stewardship and sustainability
- Provides a framework for other long-range plans in the city
- Includes specific implementation measures and strategies
- Links future growth and development to the Capital Improvement Plan
Plan Outcomes

As a result of the careful process and extensive documentation described above, the City Council adopted the 2030 Comprehensive Plan by unanimous vote (in October 2009), and with broad public support, despite sweeping changes from the prior plan. Among the major achievements of the new document were:

- The creation of the City’s first citywide Future Land Use Map to shape growth and guide zoning policy.
- The introduction of sustainability as a guiding theme across the Plan elements.
- A significant simplification of the former plan, cutting the number of policies and actions by four-fifths, and the number of small area plans by two-thirds.
- The addition of new chapters covering environmental protection, urban design, and arts and culture.
- The elimination of conflicting and inconsistent policies across the Plan, reflecting a new level of interdepartmental coordination.

Realizing the benefits of these outcomes requires an ongoing commitment to implementing the policies and actions of the Plan and to keep it updated over time. The next section highlights how this commitment is being met.

Avoiding Triviality: Keeping Raleigh’s Plan Relevant

For any plan to have a meaningful impact, it must be created through a legitimate process, and contain meaningful and obtainable goals, policies, and outcomes. However, none of these things has worth outside of an institutional commitment to abide by the policy guidance in the plan, and to effectively implement the plan’s recommendations. A high quality document is necessary to generate the will to implement it, but even the best plans can (and do) sit unused on a shelf. This section focuses on the specific actions taken to jumpstart implementation of the 2030 Comprehensive Plan and to maintain its relevance going forward. Emphasis is placed on the three vectors of plan implementation: guidance for discretionary decisions, land use regulations and guidelines, and capital projects.

Implementation Chapter

The implementation chapter builds instructions into the DNA of the Plan for how the Plan is to be implemented and amended over time. Among the specific policies and actions in the chapter are the following highlights:

- The preparation of an annual progress report, tracking every action item in the plan, as well as decisions made by the Planning Commission and City Council
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(such as rezonings) and their consistency with the Plan.

• Based on the above report, the preparation of annual staff-initiated Comprehensive Plan amendments to enhance, clarify, or delete policies found to be wanting, remove actions items as they are completed, add new policies or actions when needed, and to update key maps and tables.

• Incorporating the Comprehensive Plan into the City’s Capital Improvement Program process, in terms of both identifying and prioritizing capital projects.

• An update of the Community Inventory and a larger-scale reexamination of the Comprehensive Plan undertaken on a five-year schedule, in order to ensure that the plan incorporates unanticipated trends, events, or circumstances.

Of these three undertakings, the annual progress report is the most important and in some ways the most difficult. Action items have to be tracked across many different departments that have not historically seen the Comprehensive Plan as core to their mission. Further, it is often uncomfortable for elected and appointed officials to be reminded in a report of decisions they made contrary to their own adopted policies. However, this report is now becoming integrated into the culture of the City of Raleigh service organization, and is meeting growing acceptance by the City’s professional and official leadership.

New Development Code
Early on in the process, it became apparent that the existing development regulations did not promote the land use and development policies of the 2030 Comprehensive Plan. An equally ambitious rewrite of the entire development code was needed. The Comprehensive Plan contained approximately 120 action items that were code related; each of them would be considered as part of the code drafting process.

The success of the planning effort helped justify a substantial budgetary allocation for a new development code in spite of the worsening recession. Work on an RFP and consultant selection began while the Plan was still in the adoption process. By moving seamlessly from Plan adoption to code drafting, it helped cement in the public’s mind that the two undertakings were an inseparable part of a single process. Further, with the Comprehensive Plan process still fresh, there was little need to retest key assumptions with the public as part of the outreach effort.
While the new development code is still in the process of adoption, the draft successfully builds upon the work done in the Comprehensive Plan and will provide the City with a much better set of regulatory tools with which to implement the Plan. At the same time, the specific nature of code drafting led staff to reconsider aspects of the Comprehensive Plan; most notably its focus on density rather than form. As a result, staff prepared a series of Plan amendments intended to harmonize the Land Use and Urban Design elements with the new code, to be adopted simultaneously with the Code.

Implementation Tracking and Policy Consistency

Raleigh has long permitted the filling of up to 50 percent of a site to raise property out of the 100-year floodplain for development. With its new focus on sustainability, the 2030 Comprehensive Plan adopted as policy a “no adverse impact” approach to floodplain management, whereby activity in the floodplain should not impact other floodplain properties, nor abridge the natural functions of the floodplain. This policy is clearly in conflict with current City law.

In 2010, an ordinance was brought forward that would have prohibited any fill or development within the floodplain, with relief available for sites so severely constrained as to be left unbuildable. This ordinance met with overwhelming resistance from homeowners located in the floodplain, and was eventually denied by the City Council.

The matter may have rested there, but as per the guidance in the implementation chapter, staff had to bring this inconsistency back to the attention of the City Council as part of the annual progress report. A decision was made to amend an action item giving the staff the latitude to pursue other regulatory options for implementing the Plan’s floodplain policies. While this work is still ongoing, the Plan successfully avoided letting a key deficiency in the City’s environmental regulations be ignored.

Conclusions

Planning theory often focuses on process as opposed to plan content, as if the two were unrelated. However, if the purpose of the planning process is to produce a useful plan, then good plans are strong evidence of a good process, even if that process fails to match preconceived notions of how planning processes should be undertaken.

A comprehensive plan is a blueprint for the future. Yet, the future is inherently uncertain over the time horizon for plan implementation. The process of creating a plan, tracking it over time, and considering amendments and reexaminations keeps the plan fresh and relevant, and helps to answer the critiques of comprehensive planning discussed earlier. The process and the plan should be considered one product, never finished, and in a state of measured evolution.

The success of Raleigh’s comprehensive planning process resulted in an adopted plan with far more credibility and acceptance in the community than the prior plan. The 2030 Comprehensive Plan is already having a positive and meaningful impact on debates regarding zoning and development. Unlike the 1990s, in recent election cycles no candidate for City Council has made opposition to the Plan a campaign issue. City departments which once rarely communicated their plans to each other are now engaged in an ongoing conversation about how to best coordinate their efforts. The City’s professional planning staff is more empowered to advance good planning throughout the City. A sweeping overhaul of the City’s zoning code, completely replacing a 1950s-era framework with a modern form-centric approach, has gone to public hearing having received much comment but no outright opposition. None of these outcomes would have been likely without the foundation provided by the 2030 Comprehensive Plan.

The challenge will be to sustain this success into the future. There is no doubt that some unforeseen event or circumstance will lead to a reexamination of one or more central assumptions of the Plan. Some new energy source or technology may transform transportation. Climate change may be better or worse for the region’s weather and water supply than currently thought. New generations may have unforeseen preferences for lifestyle and living arrangements. When these changes do happen, the Plan will adapt, keeping true to its framework and intent, but evolving to react to new developments. The process by which the Plan is amended and redrafted will adhere to the same high standards for thoroughness and accountability that created it. If so, Raleigh’s Comprehensive Plan should continue to be as useful and relevant years from now as it is today.

Endnotes

8 See Planning Raleigh 2030 Request for Proposals.
9 Any requested to see any document not already posted to the projected web page resulted in it being posted there, so as to ensure equal access to information.