ARCHITECTURAL ASSOCIATION OF KENYA (AAK) ADDITIONAL COMMENTS ON THE KIAMBU COUNTY PHYSICAL AND LAND USE DEVELOPMENT PLAN (CP&LUDP)

DATE: October 2, 2026

1. **Leveraging ICT Infrastructure and Digital Innovation Hubs (Section 5.8 / Youth Interventions)**

The Plan should explicitly mandate the spatial integration, infrastructure upgrade, and financial support for existing digital innovation hubs, notably those previously established under the Ajira Digital Programme under the Ministry of Youth and Sports. While these hubs present immediate economic opportunities for youth employment, they face operational constraints due to inadequate physical infrastructure, reliable power and broadband connectivity, and technical personnel. The Plan should designate these hubs as key public ICT facilities within municipal spatial frameworks and allocate capital support for their expansion.

2. **Cartographic Precision of Administrative and Municipal Boundaries**

The **Administrative Units Map** lacks clear cartographic delineation between sub-county and municipal jurisdictions. To support effective development control, land administration, and local governance, the map should incorporate distinct, high-resolution boundary overlays that clearly differentiate sub-counties, wards, and the twelve conferred municipalities: Kiambu, Thika, Ruiru, Githurai, Juja, Kiambaa, Kabete, Kikuyu, Limuru, Githunguri, Lari, and Gatundu.

3. **Procedural Compliance, Data Currency, and Statutory Timelines (PLUPA Section 36(3))**

The initial **Notice of Intention to Plan** was gazetted on 10 December 2013, with baseline stakeholder engagements conducted between 17 and 19 December 2013. Reaching the validation phase more than a decade later raises significant concerns regarding data currency and procedural validity.

Over this period, Kiambu County has experienced substantial socio-economic transformation, rapid population growth, and urban expansion. Reliance on 2013 baseline priorities risks misaligning spatial proposals with current realities and community needs. Further, Section 36(3) of the Physical and Land Use Planning Act, 2019 requires a County Spatial Plan to be completed, published, and gazetted within eighteen months of publication of the notice of intention to prepare the plan. The County should therefore provide a formal explanation on the measures undertaken to revalidate baseline data and clarify compliance with the statutory requirements governing the preparation of the Plan.

4. **Comprehensive Disaster Risk Reduction (DRR) and Spatial Hazard Mapping (Section 5.7.2)**

Section 5.7.2 focuses predominantly on flood risk while giving limited attention to other significant natural and human-induced hazards affecting the County.

The Plan should expand its Disaster Risk Reduction framework to include:

- **Fire Disasters:** Particularly within dense informal settlements such as Kiandutu, Fort Jesus/Gitambaya, Bosnia, and Misri, where emergency response is constrained by narrow access roads and inadequate fire-fighting infrastructure.
- **Land Degradation and Quarrying Hazards:** Including machine-cut stone and gravel extraction sites within Juja, Thika, Kikuyu, and Githunguri.
- **Drought and Water Scarcity:** Especially in semi-arid areas such as Ndeiya and Nachu.

The Plan should replace generic sub-county descriptions with comprehensive spatial hazard overlay maps to guide disaster prevention, zoning restrictions, infrastructure investment, and emergency response planning.

5. Carbon Markets and Community Incentives for Environmental Stewardship (Section 5.8)

The County should formally integrate carbon credit trading mechanisms and Payment for Ecosystem Services (PES) into its spatial planning strategies for environmentally sensitive areas. Critical water catchments and forests under pressure, including Kieni, Kinale, and the Kikuyu Escarpment, can generate carbon revenue to support community-led conservation efforts, strengthen environmental stewardship, and discourage illegal logging and agricultural encroachment.

6. Reconciliation of Scope and Urban Classification Inconsistencies (Section 1.6.1 vs. 6.2.6)

There is a direct inconsistency within the document regarding the number of municipalities in the County. Section 1.6.1 references twelve municipalities, while Section 6.2.6 (Urban and Rural Population) references eleven municipalities. This discrepancy should be corrected throughout the document.
In addition, while Thika is proposed for conferment to City status, the terms "City" and "Municipality" are used interchangeably in several sections, creating ambiguity regarding the formal statutory count of urban areas under the Urban Areas and Cities Act. Clarification is required.

7. Spatial Utility Master Plans and Infrastructure Carrying Capacity (Section 8.3.8)

The Plan does not provide adequate spatial mapping of existing utility infrastructure, including water supply networks, sewer reticulation systems, and stormwater trunk infrastructure across urban centres. Conferring municipal status without demonstrating infrastructure carrying capacity presents significant public health, environmental, and service delivery risks.
The Plan should therefore incorporate:

- GIS overlay maps of existing water and sewer networks.
- Existing and proposed stormwater infrastructure.
- Sewer reticulation master plans for unserved urban and peri-urban areas.
- Utility infrastructure investment priorities aligned to projected urban growth.

8. Data Completeness in Statutory Tables (Tables 10.40, 10.42 and 10.43)

Key quantitative tables, specifically Table 10.40 (Dairy Co-operative Societies Membership, Employees, Share Capital and Turnover), Table 10.42, and Table 10.43, contain truncated, incomplete, or unreadable figures.
As a statutory planning document, all supporting datasets should be complete, legible, and verifiable to adequately support the agricultural, economic, and social policy proposals contained within the Plan.

9. Unrealistic Minimum Agricultural Subdivision Thresholds (Zones 1, 4 and 5)

In Zone 1 (Thika/Juja), Zone 4 (Githunguri, Gatundu and Limuru), and Zone 5 (Nachu/Ndeiya), the Plan proposes minimum agricultural parcel sizes as low as 0.1 Ha (approximately 0.25 acres) for small-scale agriculture and 0.045 Ha (1/8 acre) for urban agriculture.
Permitting agricultural subdivisions at these thresholds could accelerate the fragmentation of productive agricultural land into economically non-viable parcels and encourage speculative residential conversion. AAK recommends establishing a minimum agricultural subdivision threshold of 0.4 Ha (1 acre) to 1.0 Ha within high-potential agricultural zones, while restricting smaller parcel sizes to designated urban growth areas.

10. Inadequate Public Utility and Open Space Surrender Ratios (Zone 2)

The Zone 2 (Mixed Use) guidelines provide that comprehensive subdivisions exceeding 50 acres (20 Ha) should surrender 8% for light industry and 2% for public utilities.
Allocating only 2% of development land for public utilities is insufficient to address existing deficits in schools, health facilities, fire stations, public parks, and other social infrastructure. AAK recommends a mandatory minimum 10% surrender of unencumbered land for public utilities, social amenities, and public open spaces for all subdivisions exceeding 2 hectares.

11. Harmonization and Statutory Protection of Environmental Buffers

Zone 6 (Lari Forest) proposes a 20-metre forest buffer, while riparian corridors across the County continue to experience degradation due to farming, encroachment, and unauthorized development.
Environmental buffer provisions should be harmonized with national environmental legislation and relevant regulatory guidelines. AAK recommends:

- A minimum 30-metre riparian buffer along major rivers, including Ruaka, Chania, and Ndarugu.
- A minimum 50-metre buffer around gazetted forest boundaries.
- GIS-based cadastral surveys to clearly delineate protected areas and prevent encroachment and irregular titling.

12. Statutory Overlay Controls for Transit-Oriented Development (TOD) Nodes

The Plan proposes Transit-Oriented Development Action Area Plans around locations such as the Ruiru and Githurai 45 railway stations and along major transport corridors including Thika Superhighway and Ruaka. However, it does not establish enforceable development control standards.
High-density transit hubs should be regulated through statutory TOD Overlay Regulations providing for:

- Maximum plot ratios.
- Building height controls.
- Development setbacks.
- Non-Motorized Transport (NMT) reserves.
- Minimum off-street parking standards.
- Public plaza and open-space requirements.

These controls are necessary to prevent congestion, infrastructure overload, and poor urban form outcomes.

13. Legal Frameworks and Land Tenure Agreements for Action Area Plans

Major proposals such as the 200 Ha Muguga Agri-City on Kenya Agricultural and Livestock Research Organization (KARLO) land and the Del Monte Export Processing Zone (EPZ) Action Area Plan involve public institutional land and corporate leasehold interests.
To mitigate potential legal disputes and tenure conflicts, action area plans affecting national institutional land or corporate leaseholds should be supported by formal Intergovernmental Memoranda of Understanding (MoUs) and all applicable statutory approvals prior to gazettement.

14. Capital Investment Plan (CIP) Alignment and Land Value Capture (LVC)

The proposed ten-year Capital Investment Plan requires approximately KES 217.15 billion, yet the County continues to experience challenges associated with low own-source revenue, underutilized land rates, and limited fiscal capacity.
To strengthen implementation feasibility, the Plan should incorporate Land Value Capture (LVC) mechanisms, including betterment levies along major transport corridors and Transit-Oriented Development zones. Implementation priorities should also be directly aligned with five-year County Integrated Development Plan (CIDP) cycles and associated budget frameworks.

Key Recommendations for Plan Revision

1. Issue a formal addendum outlining the process of data revalidation and clarifying compliance with Section 36(3) of the Physical and Land Use Planning Act.
2. Correct inconsistencies relating to municipal classifications and urban area designations.
3. Re-render and verify Tables 10.40, 10.42, and 10.43 to ensure completeness and legibility.

4. Incorporate GIS-based utility layers, including water, sewer, drainage, hazard, and environmental protection overlays.
5. Review zoning provisions to increase minimum agricultural subdivision thresholds and strengthen protection of productive agricultural land.
6. Increase mandatory land surrender requirements for public utilities, social amenities, and public open spaces.
7. Develop statutory Transit-Oriented Development regulations to guide high-density growth corridors.
8. Establish the necessary intergovernmental agreements and land tenure frameworks for strategic Action Area Plans.
9. Integrate Land Value Capture mechanisms and other sustainable financing strategies to support implementation of the Capital Investment Plan.