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AAK/RA/NCCG/003/26 21st April 2026

Mr. Godfrey Akumali
County Secretary
Nairobi City County Government
P.O. Box 30075 – 00100
Nairobi, Kenya

Dear Sir,

RE: AAK'S MEMORANDUM ON NCCG'S ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT POLICY

Please receive warm greetings from the Architectural Association of Kenya.

Following your invitation to submit memoranda, we write in reference to the Environmental and Social Risk Management Draft Policy, recognizing its role in establishing a unified framework for identifying, assessing, and managing environmental and social risks across public and private development projects. Accordingly, we hereby submit our feedback and recommendations, which we believe will contribute to a more effective and comprehensive Policy. Our comments specifically address:

i. Climate resilience by design
ii. Incorporation of Non-Motorized Transportation (NMT) infrastructure
iii. Specification of monitoring indicators and performance measurements
iv. Development control
v. Integration with existing policies

Please find attached a summary of the recommendations from the policy presentations.

Signed

ARCH. BRENDA NYAWARA
VICE PRESIDENT, ARCHITECTURAL ASSOCIATION OF KENYA.

Architectural Association of Kenya,
Blue Violets Plaza, Kamburu Drive.
P.O. Box 44258 Nairobi, 00100
Telephone: +254 721 691 337
Email: aak@aak.or.ke
www.aak.or.ke

@arch_ke ArchKE @arch_ke

AAK MEMORANDUM ON NAIROBI CITY COUNTY GOVERNMENT'S ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT POLICY

S/NO.	ITEM	DESCRIPTION	JUSTIFICATION
1	Guiding principles: Climate resilience by design	- Finalization of the Nairobi City County Government's (NCCG) Green Building Guidelines - Incorporation of the guidelines as a requirement in the upcoming Act – to be influenced by the Policy - Integration of Nature-based Solutions (NbS) in developments and county projects	- Consider including green design as a requirement for the issuance of development approvals - This can also be considered as an incentive for fast-tracking development approvals - Extend these requirements to the ongoing regularization exercise - Integration of developments (public and private) and other county projects with NbS including bioswales, permeable pavements as a flood risk mitigation strategy
2	Non-Motorized Transportation (NMT) Infrastructure	Integration of NMT infrastructure in road design, upgrade and maintenance	- Ensures safety of road users - Social and health benefits - Reduces conflict between road users i.e. pedestrians, cyclists and motorists - Inclusion of Persons With Disabilities (PWDs)
3	Monitoring Indicators and Performance Measurements	- The KPIs can be made more specific	Report on the specific; - Climate resilience measures that have been implemented - Development projects incorporating climate resilience measures - Climate adaptation measures implemented - Reduction on greenhouse gas emissions Also track progress over a specified period of time (e.g. in phases)

4	Development Control	In a landmark constitutional petition between the Parklands Resident Association (PRA) and the NCCG in October 2025, the county was required to establish a County Consultative Forum within 6 months, which is a requirement under section 14 of the Physical and Land Use Planning Act (PLUPA), with progress reports issued.	- What progress has been achieved? - When will this forum be instituted? - The Forum handles matters on development control before escalation to the Environment and Land Court.
5	Integration with existing policies	- The Decarbonization Roadmap for the Buildings and Construction sector provides a pathway for the industry to reduce greenhouse gas emissions in alignment with the Global ABC's vision of a zero-emission built environment by 2050, and Kenya's second Nationally-Determined Contributions which target a 32% emission reduction by 2030.	- The Roadmap proposes emission reduction pathways including energy efficiency, adoption of low-carbon building materials, climate resilient housing, sustainable climate financing and strengthened regulatory enforcement. - This Policy outlines the procedural steps that can be implemented to achieve the roadmap's targets including risk screening, impact assessment, mitigation, and monitoring across entire project lifecycles.