AAK | PROMOTING EXCELLENCE IN THE BUILT ENVIRONMENT

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Environmental Design Consultants

AAK/RNA/KCG/CSP/026/46 8th July 2026

Plan. Hannah Maranga,
The County Director,
Physical and Land Use Planning,
RedNova, Kiambu, Kenya**.**

Dear Madam,

RE: ARCHITECTURAL ASSOCIATION OF KENYA MEMORANDUM ON THE DRAFT KIAMBU COUNTY PHYSICAL AND LAND USE DEVELOPMENT PLAN (2026–2036)

The Architectural Association of Kenya is the umbrella professional body for built and natural environment professionals in Kenya, representing Architects, Planners, Quantity Surveyors, Landscape Architects, Environmental Design Consultants, Project Managers, Interior Designers and Engineers. As a key stakeholder in spatial planning, urban development and sustainable land management, the Association has reviewed the Draft Plan from a professional, technical and policy perspective.

AAK commends the County Government of Kiambu for preparing its first comprehensive County Physical and Land Use Development Plan and for undertaking a planning process that seeks to address critical issues including rapid urbanization, agricultural land conversion, environmental conservation, infrastructure development and economic growth.

The Association particularly appreciates the Plan's integrated development approach, emphasis on agricultural productivity, climate resilience, environmental sustainability, and the inclusion of innovative interventions such as the Agri-City and Transit-Oriented Development Action Area Plans.

Notwithstanding these commendable proposals, AAK has identified several areas that would benefit from further strengthening to enhance legal compliance, implementation effectiveness, development control, agricultural sustainability and equitable development outcomes.

Please find below a summary of AAK's submissions for consideration.

Signed,

George A. Ndege, Architect
PRESIDENT ARCHITECTURAL ASSOCIATION OF KENYA

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SUMMARY OF AAK'S SUBMISSIONS ON THE KIAMBU COUNTY SPATIAL PLAN 2026-2036

S/No.	Issue Identified	Comment / Observation	Recommendation / Proposed Amendment	Rationale / Justification
1	Agricultural Development	The Plan recognizes agriculture as a key economic pillar and highlights the threats posed by land fragmentation and conversion of agricultural land.	Strengthen implementation measures for agricultural land protection, including Agricultural Protection Areas and minimum subdivision standards.	Protects food security, agricultural productivity and rural livelihoods.
2	Public Participation	The Plan references stakeholder engagement but does not include a consolidated Public Participation Report demonstrating how stakeholder views informed the final proposals.	Prepare and append a comprehensive Public Participation Report.	Enhances transparency and compliance with constitutional and statutory requirements.
3	Legal and Procedural Compliance	The planning process commenced under the repealed Physical Planning Act and was completed under the Physical and Land Use Planning Act, 2019.	Include a legal compliance statement explaining the transition and confirming conformity with current legislation.	Strengthens procedural integrity and legal defensibility of the Plan.
4	Zoning and Development Control	The Plan lacks a detailed zoning schedule containing development standards and land-use controls.	Develop and adopt a zoning schedule specifying permitted uses, densities, plot ratios, coverage standards, setbacks and height controls.	Effective implementation requires enforceable development control standards.

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5	Rapid Urbanization	Rapid urban growth and uncontrolled development are identified as key planning challenges throughout the Plan.	Strengthen urban growth management measures including clearly defined urban growth boundaries and phased urban expansion strategies.	Supports orderly urbanization and reduces pressure on agricultural land.
6	Municipal Boundaries	The Plan identifies municipalities and urban centres, but their development control function is not sufficiently articulated.	Clearly delineate and map all municipal and urban boundaries within the county.	Supports development control and efficient infrastructure planning.
7	Githunguri Agricultural Zone	Githunguri is identified as a major agricultural production area but supporting infrastructure investment is not sufficiently prioritized.	Prioritize agricultural infrastructure and market-access investments within Githunguri Sub-County.	Supports agricultural productivity and local economic development.
8	Good Shepherd–Lioki Road	The road has significant potential to unlock agricultural opportunities within Githunguri and Ikunu Wards but is not prominently prioritized in the implementation framework.	Include the Good Shepherd–Lioki Road as a priority infrastructure project in the Plan's implementation programme.	Improved accessibility would enhance agricultural logistics, productivity and rural economic growth.
9	Equitable Revenue Allocation	Agricultural areas contribute significantly to food production, conservation and ecosystem services but may receive less investment compared to highly urbanized municipalities.	Establish a framework for equitable infrastructure and development investment across both urban and agricultural areas.	Promotes balanced spatial development and recognizes the county-wide value of agricultural and conservation areas.

10	Affordable Housing	The Plan recognizes housing challenges but lacks specific implementation mechanisms for affordable housing delivery.	Introduce clear affordable housing targets and inclusionary housing provisions within urban areas.	Supports inclusive and sustainable urban development.
11	Green Infrastructure and Open Spaces	The county possesses important green spaces, forests, golf courses, stadiums and ecological assets. Additionally, Opportunities exist to mainstream nature-based solutions throughout the county.	Strengthen protection, management and expansion of green and open spaces. Promote urban forests, green corridors, riparian parks and interconnected open-space networks.	Supports biodiversity conservation, recreation, tourism and climate resilience. Enhances environmental sustainability and urban livability.
12	Environmental Protection	The Plan identifies encroachment into wetlands, riparian reserves and environmentally sensitive areas.	Establish Environmental Protection Overlay Zones and strengthen development restrictions within sensitive areas.	Helps safeguard ecological systems and natural resources.
13	Waste Management Infrastructure	Proposed landfill developments require stronger environmental safeguards.	Ensure all proposed landfill projects are supported by comprehensive Environmental and Social Impact Assessments.	Minimizes environmental and public health risks.
14	Monitoring and Evaluation	The implementation framework can be strengthened through clearer performance indicators.	Introduce measurable indicators and periodic implementation review mechanisms.	Facilitates accountability and effective implementation.