AAK | PROMOTING EXCELLENCE IN THE BUILT ENVIRONMENT

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Environmental Design Consultants

AAK/RA/NA/026/62 21st October 2026

The Clerk of the Senate,
Clerk's Chambers Parliament Buildings,
P.O. Box 41842-00100,
Nairobi, Kenya

Dear Sir/Madam,

RE: ARCHITECTURAL ASSOCIATION OF KENYA MEMORANDUM ON THE KENYA ROADS (AMENDMENT) BILL, 2024

Receive warm greetings from the Architectural Association of Kenya (AAK).

AAK is the umbrella professional association representing practitioners across the built environment, including Architects, Engineers, Town Planners, Landscape Architects, Interior Designers, Environmental Design Consultants, Construction Project Managers and Quantity Surveyors. The Association appreciates the opportunity to review and submit comments on the Kenya Roads (Amendment) Bill, 2024. As the umbrella professional body for built and natural environment professionals in Kenya, AAK has a keen interest in policies and legislation that influence the planning, design, construction, and management of the country's infrastructure.

Through this memorandum, AAK provides recommendations aimed at strengthening provisions on non-motorized transport infrastructure, including cycling tracks and pedestrian walkways, with particular emphasis on safety, accessibility, universal design, maintenance, and integration within the road network.

We remain committed to supporting the development of safe, inclusive, and sustainable transport systems and trust that our submissions will be considered during the review of the Bill. Please find attached our detailed memorandum for your consideration.

Signed,

GEORGE A. NDEGE, ARCHITECT
PRESIDENT, ARCHITECTURAL ASSOCIATION OF KENYA

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The Kenya Roads (Amendment) Bill 2024 Proposed Amendments

CURRENT PROPOSED AMENDMENT	***IMPROVED PROPOSED AMENDMENT***
"cycling lane" means on road lanes exclusively reserved for use by bicycles and wheelchairs, with clear markings separating them from other lanes used by motorized vehicles	"cycling lane" means on road lanes exclusively reserved for use by bicycles and wheelchairs, with ***roadside kerbs/ bollards*** separating them from other lanes used by motorized vehicles, with ***a minimum clear width that allows a bicycle to overtake a wheelchair comfortably, and should be made of smooth material for rideability.***
"cycling track" means on road lanes exclusively reserved for use by bicycles and wheelchairs, and is physically separated from tracks used by motorized vehicles	"cycling track" means on road lanes exclusively reserved for use by bicycles and wheelchairs, and is physically separated from other tracks used by motorized vehicles ***by the use of a median or landscaping lane with a minimum clear width that allows a bicycle to overtake a wheelchair comfortably, and should be made of smooth material for rideability.***
"pedestrian walkway" means that part of the road exclusively reserved for use by pedestrians and is physically separated from lanes used by motorized vehicles	"pedestrian walkway" means that part of the road exclusively reserved for use by pedestrians and is physically separated from lanes used by motorized vehicles ***and should be continuous even at intersections, well connected and universally accessible with adequate clear width to accommodate two pedestrians walking in opposite directions while carrying luggage.***
3. Section 4(2) of the Principal Act is amended by inserting the following new paragraphs immediately after paragraph (a) (aa) designing and constructing designated tracks for non-motorized transport for existing roads and new roads under its control including cycling lanes and	3. Section 4(2) of the Principal Act is amended by inserting the following new paragraphs immediately after paragraph (a) (aa) ***designing, constructing and maintaining*** designated ***and universally accessible*** tracks ***with no physical obstructions*** for non-motorized

pedestrian walkways which shall be separated from tracks for motorized transport	transport for existing roads and new roads under its control including ***cycling tracks*** and pedestrian walkways which shall be ***physically*** separated from tracks for motorized transport
4. Section 7(2) of the Principal Act is amended by inserting the following new paragraphs immediately after paragraph (a) (aa) designing and constructing designated tracks for non-motorized transport for existing roads and new roads under its control including cycling lanes and pedestrian walkways which shall be separated from tracks for motorized transport	4. Section 7(2) of the Principal Act is amended by inserting the following new paragraphs immediately after paragraph (a) (aa) ***designing, constructing and maintaining*** designated ***and universally accessible*** tracks ***with no physical obstructions*** for non-motorized transport for existing roads and new roads under its control including ***cycling tracks*** and pedestrian walkways which shall be ***physically*** separated from tracks for motorized transport
5. Section 10(2) of the Principal Act is amended by inserting the following new paragraphs immediately after paragraph (a) (aa) designing and constructing designated tracks for non-motorized transport for existing roads and new roads under its control including cycling lanes and pedestrian walkways which shall be separated from tracks for motorized transport	5. Section 10(2) of the Principal Act is amended by inserting the following new paragraphs immediately after paragraph (a) (aa) ***designing, constructing and maintaining*** designated ***and universally accessible*** tracks ***with no physical obstructions*** for non-motorized transport for existing roads and new roads under its control including ***cycling tracks*** and pedestrian walkways which shall be ***physically*** separated from tracks for motorized transport
6. The principal act is amended by inserting a new section immediately after section 11- 11A Each county government shall – a) design and construct designated tracks for non-motorized transport for existing roads and new roads under its control including cycling lanes and pedestrian walkways which	6. The principal act is amended by inserting a new section immediately after section 11- 11A Each county government shall – a) ***design, construct and maintain*** designated ***and universally accessible*** tracks ***with no physical obstructions*** for non-motorized transport for existing roads and new roads under its control including

shall be separated from tracks for motorized transport	***cycling tracks*** and pedestrian walkways which shall be ***physically*** separated from tracks for motorized transport

NOTES

- Cycling lanes separated from motorized traffic lanes by road markings have been proven to be ineffective since motorised traffic does not respect their presence. Jogoo Road has a cycling lane, and very few people are aware of it since it is dominated by motorized traffic.
- Pedestrian walkways that have been constructed historically have always had their clear width reduced by the erection of billboards, street lighting, road signage reducing the space available for use by pedestrians.
- Moreover, unlike carriageways, pedestrian walkways tend to be terminated haphazardly and poorly resolved at junctions leaving pedestrians to use motorized traffic lanes at such instances which is very unsafe more so for vulnerable road users. Pedestrian walkways and cycle tracks also tend to be poorly connected to other streets and roads.
- Pedestrian walkways have also historically not be built to accommodate universal access which forces pedestrians who are PWD to use the motorized traffic lanes compromising their safety on our roads, which amounts to discrimination of PWD and other vulnerable road users.

SIGNED

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Chairperson, Engineers' Chapter,
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Arch. Jacqueline Kairu
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