



# STATUS OF THE BUILT ENVIRONMENT REPORT



**2025**



# SBE 2025

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# Executive Summary

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The Status of the Built Environment (SBE) Report 2025 provides a high-level assessment of Kenya's construction landscape, a sector that continues to play a central role in national development. Real estate currently contributes 5.3% to Kenya's GDP, underscoring its importance to employment, investment, urban transformation, and the delivery of essential public infrastructure.

Despite this significance, the sector continues to face persistent challenges. These include declining development approvals in key counties, slow uptake of professional services, lack of regulation of key professions, uneven implementation of spatial and development plans, weak compliance with building standards, delays in permitting systems, limited

adoption of digital processes, and an oversupply of graduates relative to available industry opportunities. Rising construction costs, climatic pressures, and regulatory inconsistencies further complicate the operating environment.

This report aims to provide a clear, evidence-based picture of the sector's performance in 2025, highlighting emerging trends, key risks, regulatory developments, and opportunities for reform. It seeks to support policymakers, professionals, investors, and development partners in making informed decisions that strengthen governance, enhance resilience, and promote sustainable, well-planned, and inclusive built environments across Kenya.



The real estate sector currently contributes **5.3%** to Kenya's GDP.

# 01.

## Overview of Kenya's Construction Industry in 2025

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Kenya's construction industry in 2025 reflects a sector navigating structural reforms, shifting economic conditions, and evolving urbanization pressures. Progress in spatial planning remained gradual: by the end of 2025, only 19 counties (40%) had completed and were implementing their County Spatial Plans. This planning deficit continues to shape the sector's performance, influencing development control, infrastructure delivery, and long-term urban resilience. The year saw continued urban transformation, including the conferment of seven new municipalities, bringing the national total to 117. With an urbanization rate of 4.4% per annum, the country now hosts approximately 2,636 urban centres, yet only 202 are adequately planned, highlighting the persistent gap between rapid growth and adequate planning.

Private sector employment in construction recorded a -1.29% drop, falling from 226,300 in 2023/24 to 223,383 in 2024/25, reflecting the sector's sensitivity to broader macroeconomic pressures, especially as the year-on-year inflation rate rose from 2.7% in October 2024 to 3.3% in January 2025, reaching 4.6% by October 2025. On the other hand, government spending on housing and community amenities rose sharply by 40.68%, from KES 59 billion to KES 83 billion, signaling continued public investment in the built environment. Expenditure on environmental protection also increased from KES 11 billion to KES 15 billion, although national forest cover has stagnated at 12.13%.

Development activity also reflected varied performance across counties. The National Construction Authority registered 4,687 projects in 2025, a 14% increase from 2024, with an estimated project value of KES 358 million. Notably, Nairobi received 1,693 development applications between January and October, down 4% from 2024 and continuing a three-year downward trend. The total value of projects submitted in Nairobi fell by 31%, from KES 273 billion to KES 187 billion. In January 2025, approved building plan values in Nairobi dropped to KES 8.6 billion, the lowest on record, illustrating significant lost output and revenue. In contrast, Kisumu recorded a 24% increase in applications and generated KES 11.4 million in fees, reflecting renewed development momentum.

Digital transformation of development control remained slow. As of 2025, only eight counties, Nairobi, Mombasa, Kisumu, Nakuru, Kajiado, Machakos, Kilifi, and Murang'a, had online permitting systems, and even among these, Nakuru, Kisumu, Machakos, and Kajiado systems were offline. Even so, professionals still face numerous challenges when submitting applications in these systems, including frequent downtime, inconsistent invoicing, poor interdepartmental coordination, and the need for unofficial facilitation fees to obtain approvals. Weak enforcement capacity also persisted, with the National Building Inspectorate auditing just 396 buildings in 2025, a drastic drop from 20,649 in 2024. 87% of the audited projects failed to meet building standards or lacked approvals.

Housing delivery under the Affordable Housing Programme showed measurable progress. By October 2025, 3,611 units had been completed since September 2022, including 1,630 units delivered in 2025 in Nairobi, Homa Bay, Kakamega, and Nakuru. A further 307 projects comprising 214,057 units were ongoing across various counties.

Construction costs rose moderately in 2025, influenced by fuel prices and inflation but cushioned by currency stability. Standard bungalow construction costs increased by 12.27% to KES 54,730 per square meter, while middle-class maisonettes rose by 11.28% to KES 59,868 per square meter.

## GOVERNMENT INVESTMENT (SHARP INCREASE)

Housing & Community Amenities Budget:

**+40.68%**

Increase, from KES 59 Billion to KES 83 Billion.

Environmental Protection Budget:

Increase, from KSH 11 Billion to

**KSH 15B**

## PRIVATE SECTOR & MARKET ACTIVITY (MIXED TRENDS)

Total Registered Project Value (NCA):

**KSH 358M**

(for 4,687 projects).

Nairobi's Submitted Project Value:

**-31%**

drop, from KES 273 Billion to KES 187 Billion.

Nairobi's Approved Building Plans (Jan 2025):

Fell to a record low of

**KSH 8.6B**

Kisumu's Fee Generation:

**KSH 11.4M**

(from a 24% increase in applications).



The human capital landscape in the built environment continues to experience significant stress. An estimated 2,585 degree graduates and 2,014 diploma holders completed their studies in universities and national polytechnics by November 2025. Yet, the sector remains unable to absorb its annual output: a July 2025 AAK survey found that 90% of 1,709 sampled graduates and diploma holders were unemployed, despite the fact that these skilled professionals are urgently needed, as the uptake of professional services in construction projects in Kenya remains low at just 20%. Persistent regulatory gaps, particularly the absence of regulation for professions such as landscape architecture, construction project management, interior design, environmental design, and diploma-level technicians, continue to weaken industry standards and employment outcomes.

The regulatory environment underwent significant reforms in 2025. Key milestones included the enactment of the Physical and Land Use Planning Handbook 2025, replacing the 2008 edition; the rollout of the National Building Code 2024, effective from March 2025; and the enactment of new frameworks such as the Affordable Housing Regulations 2025, Nairobi City Regularization of Unauthorized Development Act 2025, and the Nairobi County Excavation Procedures.

With buildings contributing over 10.7% of Kenya's energy-related greenhouse gas emissions, decarbonizing the built environment remains a national priority. In 2025, AAK, in collaboration with the State Department for Public Works, the Global Buildings Performance Network, and multiple stakeholders, advanced the development of Kenya's first National Decarbonization Roadmap for Buildings and Construction, aligning the sector with Kenya's climate commitments and global sustainability goals.

A major highlight for the built environment sector is the upcoming Pan-African Biennale, scheduled for September 2026 in Nairobi. Led by AAK, this first-of-its-kind continental event will position Africa as a driver of architectural innovation, heritage preservation, and future-oriented urban development, rather than a passive recipient of global ideas. Under the theme "Shifting the Center – From Fragility to Resilience," the Biennale will convene architects, urbanists, designers, artists, scholars, and communities from across Africa and the diaspora. This milestone event underscores the growing importance of professional excellence, collaborative practice, and knowledge exchange in addressing Kenya's urbanization challenges, supporting sustainable construction, and shaping resilient, inclusive, and future-ready built environments.

National forest cover has stagnated at

**12.13%**

As of 2025, only **eight** counties, Nairobi, Mombasa, Kisumu, Nakuru, Kajiado, Machakos, Kilifi, and Murang'a, had online permitting systems.

Private sector employment in construction recorded a

**-1.29%**

falling from **226,300** in 2023/24 to **223,383** in 2024/25

# 02.

## Urbanization Trends and Challenges

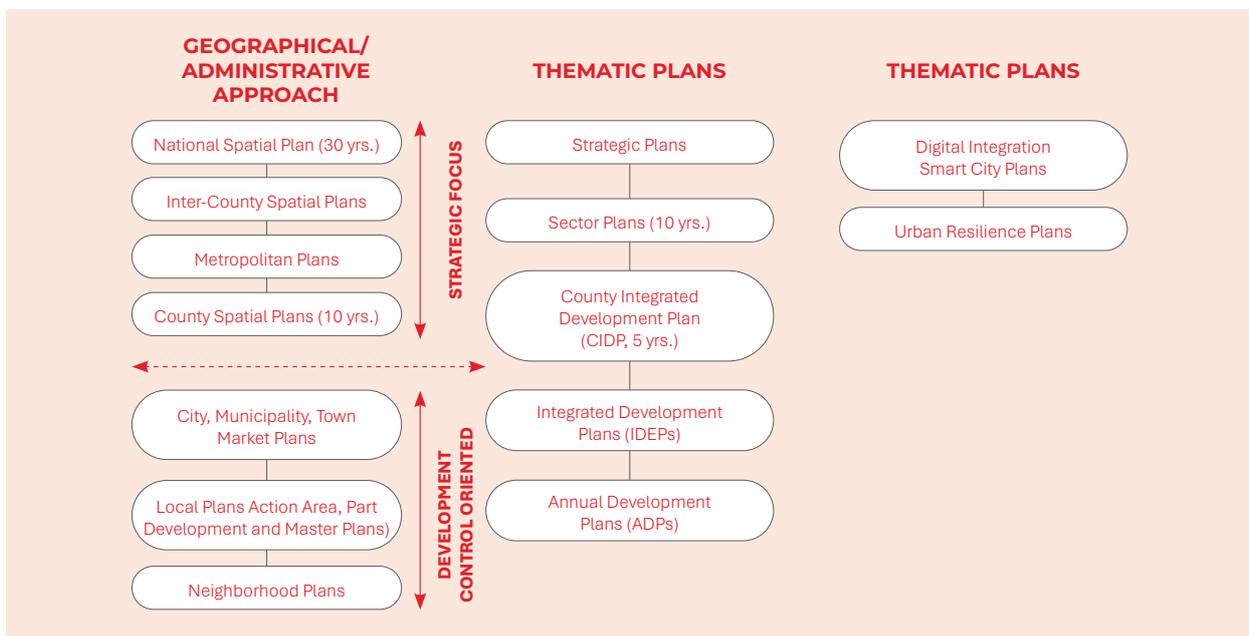
Almost half of the global population (45%) now lives in urban areas, a share that is expected to rise rapidly in the coming decades, with the fastest growth occurring in Africa and Asia, according to the 2025 World Urbanization Prospects report. It is worth noting that global estimates vary across UN data sources and years, with some, such as the UN-Habitat SDG 11 Factsheet (2023), placing urbanization at 55% of the world's population, projected to reach 70% by 2050 as reported in the [2024 SBE Report](#). The Kenya National Bureau of Statistics (KNBS) reports that 31.2% of the Kenyan population lives in urban areas, with a 4.4% urbanization rate. KNBS further observes that the day population is likely much higher, as urban centers attract people from surrounding areas for work, education, and essential services, highlighting the planning implications of daily population fluctuations.

There is broad consensus that much of urban growth is occurring in small- and medium-sized settlements, intensifying urban poverty and inequality. These smaller and intermediate centers are often the fastest-growing urban areas but typically lack the financial and planning resources available to larger cities, placing considerable pressure on their capacity to provide adequate services, infrastructure, and sustainable development. This underscores the need

for proper planning and effective implementation to ensure these centers grow sustainably and do not face the same, if not more severe, challenges as major cities.

Kenya's planning framework envisions a hierarchical system that cascades from national spatial plans to local physical plans, as illustrated in the diagram below.

Figure 2.1: Types of Plans in Kenya



Despite legal requirements under the Urban Areas and Cities Act (2011), the County Governments Act (2012), and the Physical and Land Use Planning Act (2019), no county has fully developed and enacted the complete set of statutory plans envisioned in the planning framework. For instance, only 19 counties have gazetted County Spatial Plans, and just 202 of the 2,636 urban centers are adequately planned. The incomplete planning hierarchies compel counties to rely on discretionary decision-making, creating opportunities for corruption, inconsistency, and legal challenges that are now unfolding in courts across the country.

Development control remains a persistent challenge in Kenyan urban areas, with approval processes continuing to frustrate professionals in the built environment. Currently, 39 counties still process development applications manually. In comparison, the eight counties with online systems face significant issues, including frequent downtime, inconsistent invoicing, poor interdepartmental coordination, and the need for unofficial facilitation fees to obtain approvals. Importantly, most of these challenges are not inherent to the systems themselves but are human-instigated.

The law requires county governments to constitute crucial committees and boards to ensure that key stakeholders, including professional bodies, actively participate in and support development and planning processes. These committees are intended to provide technical guidance, oversight, and coordination in the management of land, physical planning, and the built environment. However, in practice, most of these statutory caucuses have not been established or gazetted, limiting their effectiveness. For example, AAK currently sits in liaison committees for only eight counties, and even within these, many members report inadequate support from county governments, which curtails their ability to fully undertake their mandated roles.

As a result of inadequate planning and weak institutional structures to manage rapid urbanization, the quality of many existing and newly constructed buildings remains substandard and, in some cases, unsafe for occupation. Findings from the National Building Inspectorate (NBI) underscore this concern: in 2025, NBI audited 396 buildings, 87% of which lacked the requisite approvals and failed to meet basic building standards. Two buildings were demolished due to severe structural defects, while the vast majority (90%) exhibited issues such as very small or nonexistent windows and vents, insufficient setbacks, and inadequate parking provision.

The enactment of the Nairobi City Regularization of Unauthorized Development Act, 2025, enables the Nairobi City County Government to impose retroactively conditions, safety upgrades, and compliance measures, thereby improving building standards and public safety over time. However, there is a risk of weakening development control by allowing illegal developments to be regularized, thereby encouraging future non-compliance. AAK recommended restricting regularization to applications not previously reviewed and applying strong penalties to deter attempts to bypass proper planning procedures.

In 2025, Kenya's planning framework underwent a significant judicial change following landmark rulings that exposed gaps in development control. In September, the Court of Appeal's decision on the Rhapta Road zoning dispute clarified that Nairobi's 2004 City Development Ordinances and Zones no longer have legal authority under devolved governance, while the 2016 NIUPLAN remains solely a strategic plan without parcel-specific power. The Court determined that Nairobi had been operating without valid zoning instruments and ordered the county to finalize, approve, and gazette a lawful zoning and development control framework within six months. Meanwhile, development applications must be evaluated under the Physical and Land Use

Only

**19**

counties have  
gazetted County  
Spatial Plans

“

Development control remains a persistent challenge in Kenyan urban areas, with approval processes continuing to frustrate professionals in the built environment

Planning Act, 2019, guided by the Draft 2021 Nairobi City County Development Control Policy to ensure consistency and transparency. With several similar cases awaiting court decisions, counties will now be required to ensure their development control frameworks are legally compliant and fully functional.

Significant social challenges persist in urban areas. Among youth aged 15 to 34, the unemployment rate is alarmingly high at 67%, according to the Federation of Kenya Employers. Elevated living costs are placing increasing pressure on households, with data from the Kenya National Bureau of Statistics indicating that the year-on-year inflation rate has risen from 2.7% in October 2024 to 3.3% in January 2025, reaching 4.6% by October 2025. Income inequality persists, with over 60% of the urban population residing in informal settlements that have limited access to essential services, thereby exacerbating social fragmentation. A substantial deficit in affordable housing and infrastructure exposes residents to poor sanitation and insecure land tenure.

Governance and political stability were undermined by widespread mistrust, corruption, and recurrent youth-led protests, most of which unfolded in urban areas. In June 2025, one year after deadly June 2024 demonstrations swept across the country, thousands of young people again took to the streets in 27 of Kenya's 47 counties, signaling persistent discontent with authorities. 16 people were killed, primarily by police bullets, underscoring the depth of frustration and the fragility of state-citizen relations. Crime also remains a serious concern, particularly in Nairobi's Central Business District, where several cases of gang-related mugging, robberies, and drug

offenses were reported in 2025. Additionally, gender-based violence and femicide continue to threaten the safety of women and girls, highlighting urgent social challenges. Collectively, these factors reinforce the need for inclusive, transparent, and well-coordinated urban development interventions to restore public trust and strengthen social stability.

The fight against climate change will remain elusive without strong planning tools and effective urban management systems to support mitigation and adaptation efforts. Between late 2024 and October 2025, more than 315,500 people were displaced by floods, 228 people lost their lives, 12,000 livestock died, and over 36,000 acres of cropland were destroyed. At the same time, the country faces a climate adaptation financing gap estimated at Sh335 trillion. These figures, drawn from the Kenya Red Cross, National Disaster Management Authority, Kenya Meteorological Department, UNEP, and government surveys, highlight the urgency of immediate action. Bridging the persistent gap between disaster-resilience planning and implementation is now essential to protect communities and promote long-term urban sustainability. At the same time, public open spaces continue to shrink and face encroachment, waste management remains inadequate, and infrastructure deficits, from stormwater systems to green mobility networks, leave Kenyan cities highly vulnerable. Given that Kenya is among the countries most adversely affected by climate change, urbanization must happen sustainably. Otherwise, the country will continue to accumulate climate risks faster than it can mitigate them, undermining long-term resilience and the well-being of its urban populations.

The year-on-year inflation rate has risen from

**2.7%**

in October 2024 to

**3.3%**

in January 2025, reaching

**4.6%**

by October 2025



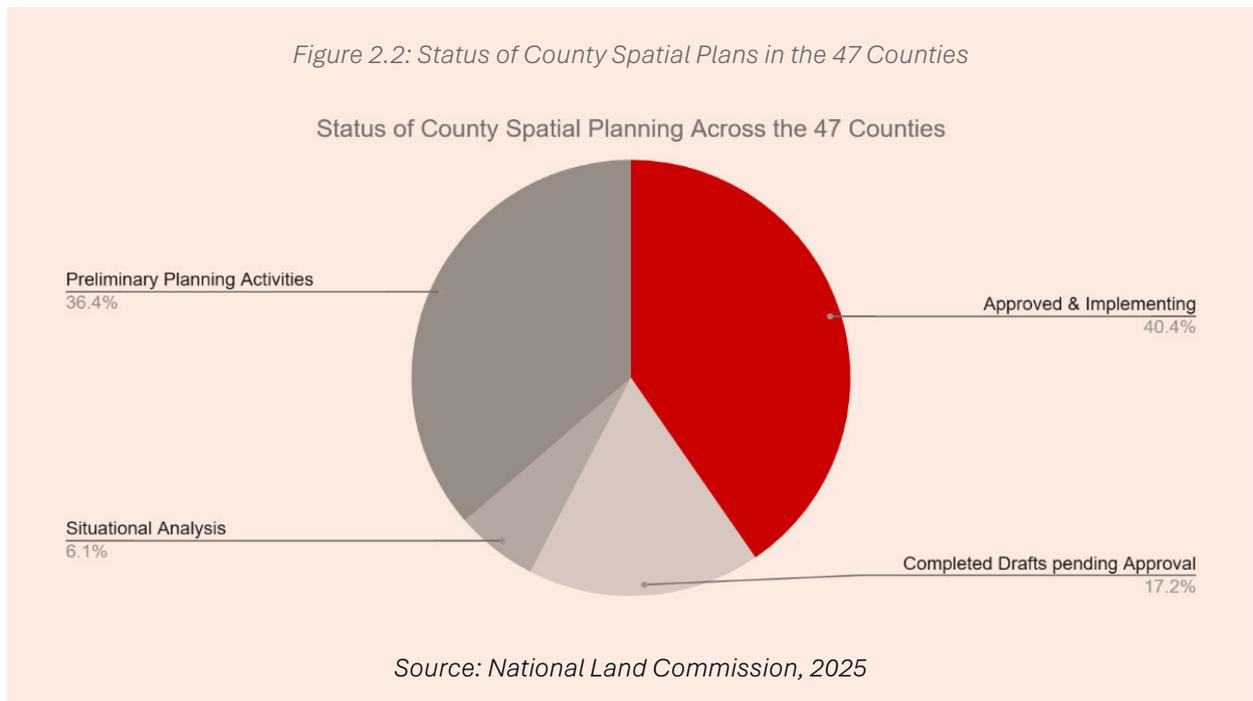
## 2.1. County Planning: 2025 Progress, Challenges, and Implications

The County Governments Act (2012) provides for County Spatial Plans to guide land use and development over a 10-year period, ensuring orderly, sustainable, and coordinated growth. They help counties manage resources, reduce land-use conflicts, improve service delivery, support disaster preparedness, and provide a foundation for development control and local planning.

According to the National Lands Commission

(NLC) data, 19 counties (40%) have completed and are implementing approved County Spatial Plans (CSPs) as of August 2025. These counties include Lamu, Makueni, Kericho, Bomet, Kilifi, Kwale, Narok, Nakuru, Kajiado, Bungoma, Siaya, Trans Nzoia, Nyandarua, Migori, Kirinyaga, Nandi, Nairobi, and Mombasa. 3 CSPs for Baringo, Busia, and Elgeyo Marakwet counties were gazetted in 2025. This marks a 19% increase from 2024, when only 16 counties had approved CSPs.

Figure 2.2: Status of County Spatial Plans in the 47 Counties



In addition to the approved plans, 8 counties (17%) have completed draft CSPs that are awaiting County Assembly approval. These are Murang’a, Nyeri, Turkana, Samburu, West Pokot, Laikipia, Tharaka Nithi, and Nyamira.

A further 3 counties (6%)- Vihiga, Kakamega, and Taita Taveta- are currently conducting situational and

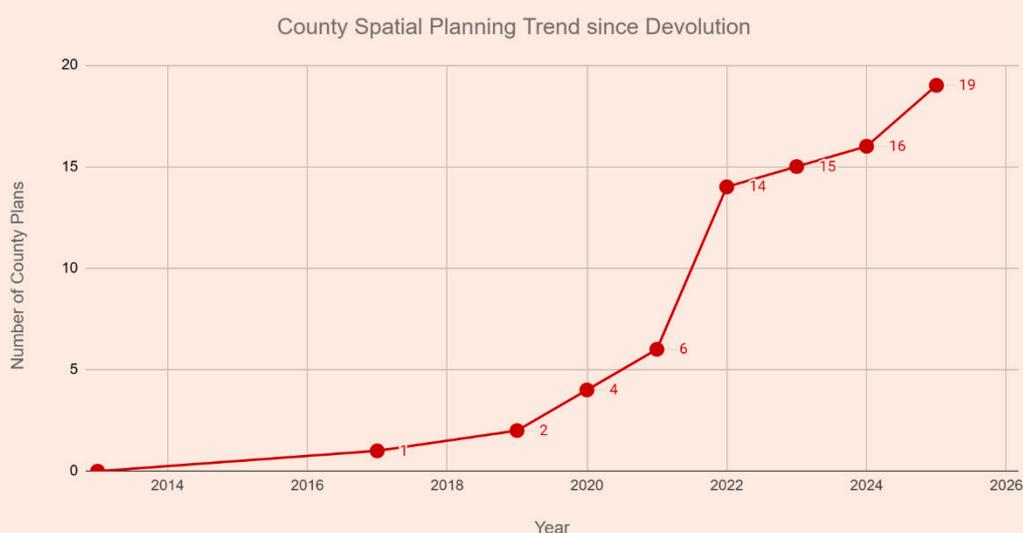
data analysis.

The remaining 17 counties (36%) have initiated preliminary planning activities. These include Wajir, Marsabit, Isiolo, Mandera, Embu, Kitui, Meru, Kisumu, Kisii, Homa Bay, Garissa, Machakos, Uasin Gishu, Kiambu, Tana River, Elgeyo Marakwet and Busia.



**Baringo, Busia, and Elgeyo Marakwet counties** gazette their CSPs in 2025, marking a **19%** increase from 2024

Figure 2.3: Status of county spatial plans since devolution



Source: National Land Commission, 2025

The increase in approvals between 2021 and 2025 is largely attributed to technical and financial support from development partners such as the Food and Agriculture Organization (FAO), the European Union (EU), and the Digital Land Governance Programme (DLGP).

Table 2.1: County spatial plans completion status

Completion status (%)	Status of CSP	Counties
100	Completed, approved by County Assembly and plan being implemented (19)	Lamu, Makueni, Baringo, Kericho, Bomet, Kilifi, Kwale, Narok, Nakuru, Kajiado, Bungoma, Siaya, Trans-Nzoia, Nyandarua, Migori, Kirinyaga, Nandi, Mombasa, Nairobi
75	Draft plan awaiting County Assembly approval (8)	Murang'a, Nyeri, Turkana, Samburu, West Pokot, Laikipia, Tharaka Nithi, Nyamira
50	Data collected and situational analysis ongoing (3)	Vihiga, Kakamega, Taita Taveta
25	Initiated CSP and undertaking preliminary activities (17)	Wajir, Marsabit, Isiolo, Mandera, Embu, Kitui, Meru, Kisumu, Kisii, Busia, Uasin Gishu, Homa Bay, Garissa, Machakos, Elgeyo Marakwet, Kiambu, Tana River

This represents a serious violation of Section 104(1) of the County Government Act 2012, which, together with the National Land Commission's guidelines, clearly states that counties without spatial plans are not legally eligible for funding from the National Treasury. Insufficient technical knowledge, inadequate skills, and a lack of effective tools continue to hinder the development, implementation, monitoring, and evaluation of spatial plans.

## 2.2. Status of Urban Planning in Kenya

Kenya has approximately 2,636 urban centres, out of which only 202 are adequately planned according to the National Land Commission. The planning status is as follows:

Table 2.2: Status of planning of urban centers in Kenya

Status	Number of Centers	Percentage
Effectively Planned	202	7.7%
Planning in Progress	389	14.7%
Unplanned	2,030	77%
Operating on Outdated Plans	15	0.6%

Source: NLC, 2025

Counties such as Makueni, Nakuru, Nandi, Nyeri, and Nairobi have demonstrated strong urban planning efforts. However, the majority of urban centres remain unplanned, contributing to infrastructure strain, environmental degradation, and disorganized growth.



Kenya's urbanization rate:

**4.4%**

per annum.

Number of urban centres:

**2,636**

but only 202 are adequately planned.

### Challenges Affecting Planning Progress

According to the NLC, several persistent challenges continue to hinder county and urban planning efforts. These include:

1. Financial constraints, with inadequate budget allocations for planning functions
2. Shortage of qualified personnel, with non-planners often assigned technical roles
3. Low prioritization by political leaders and assemblies
4. Limited access to modern tools, such as GIS labs and mapping equipment
5. Political interference, especially during leadership transitions
6. Insecurity and logistical difficulties, particularly in border regions

### Recommendations by the National Land Commission

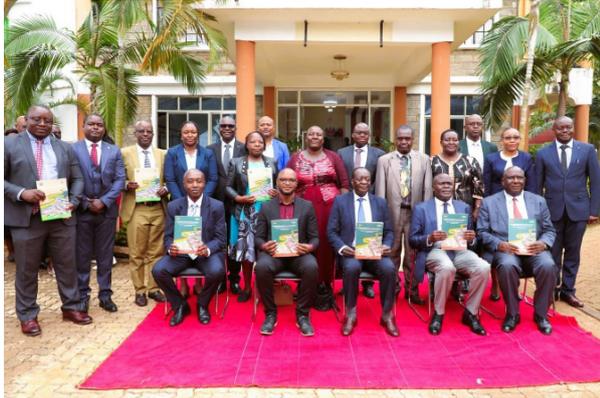
To accelerate progress and ensure sustainable development, the NLC recommends that counties:

1. Hire and retain qualified land use planners
2. Allocate sufficient and protected budgets for planning
3. Establish fully equipped GIS laboratories
4. Sensitize leaders and communities on the importance of planning
5. Strengthen partnerships with NLC, development partners, and security agencies
6. Enact and enforce supportive county legislation

## 2.3. New Municipalities Conferred

In 2025, Kenya conferred 7 new municipalities, increasing the total to 117 from 110 at the end of 2024. The total number of municipalities is spread across 45 counties, with Tana River and Isiolo remaining the only counties without municipalities.

This process aims to strengthen urban governance and improve service delivery through structured urbanization. The momentum is expected to continue into 2026, with several counties preparing to elevate more towns to municipality status.



*Kaimosi-Cheptulu Ad hoc Committee Chairman, Arch. Tsalwa Waburiri (AAK) hands over the final report to HE Dr. Wilber K. Ottichilo, the governor of Vihiga County. The report recommended the creation of Kaimosi Municipality*

Notably, ad hoc committees in Vihiga County have finalized reports recommending the elevation of Luanda and Cheptulu–Kaimosi, while Siaya County has completed a similar review for Ugunja. In Kiambu County, towns such as Karuri, Kikuyu, Limuru, Ruiru, and Thika have undergone evaluations and await formal approval. Meanwhile, Uasin Gishu County has completed assessments for Moi’s Bridge, Ziwa, Moiben, Turbo, Burnt Forest, and Kesses. These towns are poised for elevation in 2026.

## Summary of Counties That Conferred Municipalities in 2025

### 1. Garissa (007)

Garissa County designated Dadaab as a municipality in 2025. Known worldwide for hosting one of the largest refugee camps, Dadaab’s elevation signifies a major step in integrating humanitarian settlements into formal urban systems. Alongside Garissa town, which was previously designated, the county now has two municipalities, strengthening its position as a key urban center in Kenya’s northeastern region.

### 2. Kirinyaga (020)

Kirinyaga County granted municipality status to Sagana–Kagio and Wang’uru in 2025. These towns, known for their strategic location along major transportation corridors and vibrant agro-industrial sector, now join Kerugoya–Kutus, which previously achieved municipal status. The county’s urban portfolio now includes three municipalities.

### 3. Turkana (023)

In 2025, Turkana County upgraded Kakuma to municipality status, acknowledging its unique urban dynamics influenced by both local communities and the large refugee settlement. This achievement complements the earlier designation of Lodwar, the county’s capital. With two municipalities, Turkana is gradually developing urban governance structures that address both humanitarian and development needs.

### 4. Baringo (030)

In 2025, Baringo County conferred municipality status on three towns: Eldama Ravine, Mogotio, and Marigat. This strategic upgrade aims to enhance urban governance, improve service delivery, and attract investment in line with Kenya’s devolved development agenda. In addition to Kabarnet, the county headquarters, Baringo County now has 4 municipalities.



Source: County Government of Kisumu, 2025.

## 2.4. Transfer of Functions to Kisumu City

In 2025, Kisumu County made history as the first county in Kenya to transfer urban management functions and responsibilities to the City of Kisumu. This landmark move marks a major step towards strengthening urban governance, improving service delivery, and ensuring the efficient management of city affairs.

The transferred functions cover a wide range of critical urban services, including water and sanitation, construction and maintenance of urban infrastructure such as roads, stormwater drainage systems, walkways, and non-motorized transport (NMT) networks. They also encompass recreational parks and open spaces, street lighting, bus and taxi stands, markets, abattoirs, the promotion of sports and cultural activities, and the development and enforcement of city plans and building and development control.

Additionally, the City Manager has been delegated the role of Receiver of Revenue for the 14 wards within the City's jurisdiction, covering land and property rates, outdoor advertising, development and building plan approvals, and single business permits. This transition is expected to streamline revenue collection, enhance accountability, and position Kisumu as a model for effective urban management in Kenya.

This model offers a valuable pathway for the rest of the highly urbanizing Kenyan cities- Nairobi, Mombasa, Nakuru, and Eldoret. By transferring functions, these cities can strengthen urban governance, improve service delivery, and enhance revenue accountability. Counties benefit by focusing on rural development while cities take charge of their unique urban challenges, creating a balanced and sustainable governance framework across Kenya.

## 2.5. Kisumu City Lakefront Development Plan

In July 2025, Kisumu's transformative Lakefront Development Plan, anchored in the city's Local Physical and Land Use Development Plans (LPLUDPs), received a significant boost with a KES 97.5 million (USD 750,000) grant from the African Development

Bank (AfDB). This funding, channelled through the Urban and Municipal Development Fund (UMDF), is financing a comprehensive feasibility study that will lay the groundwork for a climate-resilient, inclusive, and economically vibrant lakefront.



Source: County Government of Kisumu, 2025

This milestone is especially significant given the total implementation cost for the Lakefront Development Plan is estimated at USD 200 million (approximately KES 31 billion). The AfDB's initial investment is expected to catalyze further funding from multilateral lenders and private investors by generating a pipeline of bankable, well-structured projects aligned with climate adaptation and urban resilience standards.

The feasibility study will align proposed lakefront projects with the city's LPLUDP, County Integrated Development Plan (CIDP), and Kenya's national Public Financial Management systems. This alignment is critical for enhancing transparency, attracting multilateral and private investment, and ensuring long-term sustainability.

### Key Elements of the Lakefront Development Plan:

- **Promenade and Ring Road:** A 46-kilometre pedestrian and cycling pathway integrated with vehicle access.
- **Zoning and Mixed-Use Development:** Residential, commercial, recreational, and conservation zones, including public beaches and aquaparks.
- **Environmental Conservation:** Protection of Dunga Wetlands and Hippo Grazing zones, with climate-adaptive infrastructure.
- **Maritime Infrastructure:** Marinas, waterbus stations, and boat-building facilities to boost tourism and local trade.
- **Community Integration:** Affordable housing, artisan markets, and cultural centres like the Dunga Handmade Products Tourist Hub.

Table 2.2: Summary of the Kisumu Lakefront Development Plan Milestones

Year/Phase	Key Milestone
2021	Legislation Passed: Kisumu Lakefront Development Corporation Bill enacted
2022–2023	Planning & Design Phase: Work on ISUD and detailed master plans
2024	Project Structuring & Partnerships: Investor engagement and UN-Habitat alignment
Mid-2025	Major Funding Secured: AfDB grant of KES. 97.5M for feasibility study
2025–2026	Feasibility & Technical Studies: Promenade, beaches, maritime infrastructure
2026 onward	Next Steps: Completion of the feasibility report and implementation of priority projects

Source: County Government of Kisumu, 2025

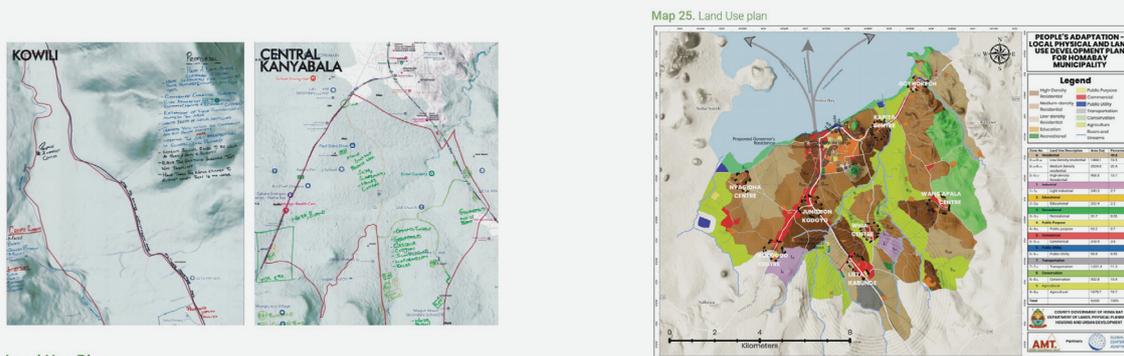
## 2.6. Homabay Municipality People’s Climate Adaptation Plan

The Homa Bay County Government’s integration of the community-driven People’s Adaptation Plan (PAP) into its official Local Physical and Land Use Development Plan (LPLUDP) was officially recognized as a significant achievement on July 22, 2025. Hailed by the Global Center on Adaptation (GCA) as a step toward climate justice, the 10-year Plan (2025-2035) marks a groundbreaking, innovative shift in Kenyan land-use planning. It is likely the first land-use plan worldwide to fully incorporate locally led adaptation

from the outset, embedding community knowledge into the official development framework.

Governor Gladys Wanga affirmed that the County’s commitment was to formally embrace the risks and solutions identified by residents, making them central to spatial planning and climate adaptation. The plan was created using a unique dual approach that combines Kenya’s official planning standards with the community-led Special Planning Area (SPA) method.

Figure 2.4: Homa Bay Municipality Proposed People’s Adaptation LPLUDP



Land Use Plan

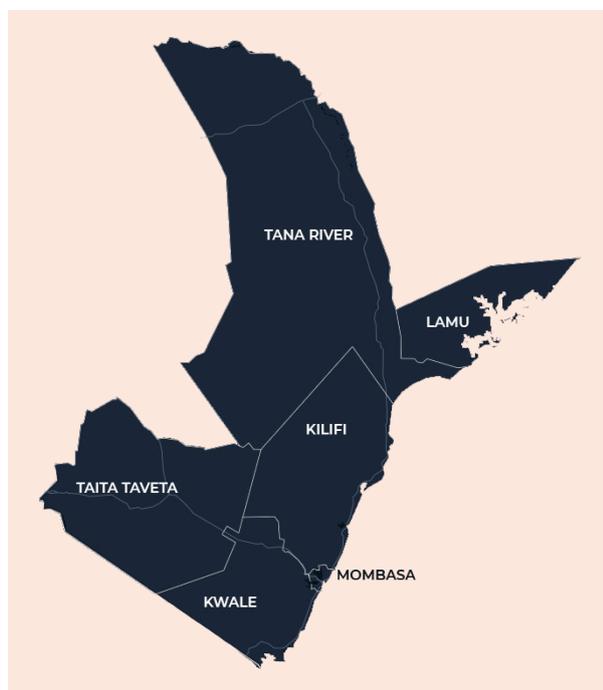
The proposed land use plan is as indicated in the map below.

Source: Homa Bay Municipality LPLUDP 2025-2035

The PAP provides a formal mandate for targeted climate-resilient investments in the built environment. Key actions include upgrading roads and drainage networks, constructing embankments, and raising market stalls to ensure essential services remain accessible during floods. It guides the expansion of safe, affordable water access through new kiosks and piped extensions. Crucially, the plan supports

housing upgrades and secure land tenure for vulnerable households, promotes renewable energy and clean cooking solutions, and institutionalizes public participation for accountable governance. The formal integration of this plan in July 2025 sets a global example for inclusive urban resilience, ensuring that local voices influence Homa Bay’s future development.

## 2.7. Lamu County Pilots Kenya’s First Land-Marine Plan under the Go Blue Project



On September 1st, 2025, Lamu County became the first in Kenya to include a marine component in its revised County Spatial Plan (2026–2036), marking a historic shift in county-level planning. This milestone, supported by the EU-funded Go Blue Project and carried out by UNEP and UN-Habitat, signals a new era of integrated land-sea planning in Kenya’s coastal regions.

### Background and Scope of the Go Blue Project

Launched in 2021, the Go Blue Project is a four-year initiative with a budget of EUR 25 million (approximately KES 3.3 billion), funded by the European Union to promote the Blue Economy across all six coastal counties: Mombasa, Kwale, Kilifi, Tana River, Lamu, and Taita Taveta. The project

is carried out in partnership with four EU member states (Germany, Italy, Portugal, and France), UN-Habitat, UNEP, and the Jumuiya ya Kaunti za Pwani (JKP) Secretariat, in collaboration with national and county governments.

### Intended Impact and Investment

Go Blue aims to unlock the potential of Kenya’s coastal and marine resources for sustainable, inclusive economic growth. The project aims to create over 3,000 jobs for youth and women, mainstream ecosystem-based land-sea planning, and strengthen blue economy value chains, including fisheries, tourism, and cultural heritage. Notably, Component 2 on Connecting People, Cities and the Ocean is implemented at a cost of EUR 7 million (approximately KES 1.05 billion), and focuses on innovative land-sea planning and management.

### A Shift in Planning Paradigms

Lamu’s adoption of the Integrated Land–Sea Planning Guidelines, developed by UNEP and UN-Habitat, is a first for Kenya. This approach ensures holistic decision-making on development, conservation, and economic growth, linking terrestrial and marine ecosystems. The plan sets ambitious goals for public open space, environmental restoration, and blue carbon readiness, positioning Lamu to secure climate finance through carbon markets.

In conclusion, the Go Blue Project’s support for Lamu’s land-marine spatial plan sets a precedent for Kenya and the region. It demonstrates how strategic investment, international partnerships, and innovative planning can drive resilient, inclusive, and sustainable coastal development, heralding a new chapter in county planning in Kenya.



## 2.8. Are Kenya's County Planners Equipped to Build the Future?

Professional bodies have raised serious concerns about compliance with mandatory qualifications in county planning appointments. The Town Planners Chapter of AAK has documented instances in which County Public Service Boards failed to adhere to professional standards in recruiting for critical positions, including the Director and Deputy Director of Physical Planning positions. The Physical Planners Registration Act (Cap 536) makes registration a prerequisite to practice, while Section 8(2) of PLUPA stipulates that all planning work must be undertaken or supervised by registered physical planners. The

Scheme of Service for Physical Planners, 2018, explicitly requires PPRB registration as a mandatory qualification for Assistant Director positions and above. Despite a Cabinet Secretary advisory in March 2025 emphasizing these legal requirements, the inclusion of unqualified and unregistered individuals in these roles continues to compromise the integrity of planning services, thus exposing counties to significant legal risks regarding the validity of planning decisions and undermining public confidence in spatial development.

### Technical Adequacy: The Status of County Planning Governing Bodies

Institutional mechanisms for development control reveal equally concerning patterns. Technical committees serve a critical function by reviewing development applications and making recommendations for approval, yet they face significant operational challenges across counties. The absence of legal or policy frameworks establishing these committees creates regulatory gaps that undermine the technical review process. Without formal committees, relevant technical stakeholders lack institutional platforms to ensure development applications comply with all sectoral laws and technical standards before County Directors provide final technical recommendations to CECMs.

Where they exist, technical committees typically comprise technical heads from the Physical Planning, Survey, Public Health, Environment/NEMA, Water and Sewerage, Roads and Public Works, and Fire/Safety departments, occasionally joined by representatives of professional bodies such as AAK. However, in counties without such committees, oversight is concentrated among County Directors and CECMs. This concentration poses significant risks, particularly when decision-makers lack technical expertise in planning principles, potentially leading to the formalization of planning irregularities that a multi-stakeholder technical review would otherwise catch.



## 2.9. Nairobi Biennale 2026: Shifting the Center – From Fragility to Resilience



Source: *The Venice Biennale, 2023*

In September 2026, Nairobi is scheduled to host a milestone event in the world of architecture – the first Pan-African Architecture Biennale, themed “**Shifting the Center – From Fragility to Resilience: Reclaiming Africa’s Architecture and Future**”.

This historic and unprecedented event will position Africa not as a passive recipient of global architectural ideas but as a driver of innovation, heritage preservation, and future-oriented design. It aims to convene architects, urbanists, designers, artists, scholars, and communities from all 54 African nations, alongside voices from the diaspora and other global regions.

For one month, Nairobi will be at the center of the architectural discourse, challenging entrenched narratives and envisioning African-led solutions to the urban, environmental, and cultural challenges of our time.

### **A Vision Rooted in Africa’s Realities**

With Arch. Omar Degan as the inaugural curator, the Nairobi Biennale is envisioned as more than an

exhibition, but a reclamation of authorship. In his words, “*The idea is to create a dialogue, but under the terms of the continent, one that is no longer dictated by someone else. It’s about taking ownership of the story, moderation, and narrative of what is happening, and why.*”

This resonates deeply in a political and artistic climate where Pan-African unity is experiencing a revival. The event will explore Africa’s built environment through the lens of **fragility**– not as weakness, but as a condition shaped by colonial histories, economic extraction, and environmental precarity. Within this fragility lie the seeds of **resilience**: adaptive vernacular traditions, cultural continuity in the face of erasure, and inventive responses to rapid urban change.

The Biennale will ask bold questions, including: how architects can design through fragility; how African urbanism can emerge as a tool for transformation, not just repair; and how the continent’s cities can grow without repeating extractive development models, and instead draw from local materials, cycles, and spatial justice.

## Why Nairobi?

The choice of Nairobi as the host city is deliberate and symbolic. With its contrast-rich urban fabric and layered urban experience, Nairobi embodies and reflects the complexities shared by many African cities. It has long served as Africa's continental hub for political solidarity, cultural exchange, and diplomatic engagement.

In recent years, architecture and design from Africa have attracted greater global attention, most notably at the 2023 Venice Architecture Biennale, curated by

Scottish-Ghanaian architect Lesley Lokko. However, many prospective African attendees were unable to participate due to visa restrictions.

Nairobi offers a solution to this; however, a choice made even more appealing by Kenya's recent removal of visa restrictions for African nationals. The Nairobi Biennale 2026 will therefore provide an avenue for African architects and designers to present their work without the need for Western validation.

Source: Google, 2025



### A Pan-African and Global Gathering

The Nairobi Biennale 2026 will feature a dynamic mix of exhibitions, discussions, workshops, and cultural performances. The programme will feature:

- **Speeches** by keynote speakers such as **Maryam Kamara (Niger)**, **Francis Kere (Burkina Faso)**, **Kunle Adeyemi (Nigeria)**, and **Lesley Lokko (Ghana/Scotland)**, alongside established architectural firms such as **Artelier Koe (Senegal)**, **Nzinga Mboup (Atelier Worofila)**, and **Hive Earth**. Other international speakers will include **Bjarke Ingels Group (BIG)**, **Shigeru Ban**, and **Kengo Kuma**, amongst others.
- **Panel Discussions** pairing African and global experts to address climate resilience, sustainable design, and cultural heritage.
- **Workshops** for students, young professionals, and communities, focusing on hands-on solutions to urban and environmental challenges.
- **National Exhibitions** from all 54 African countries, showcasing architectural responses to local climate, culture, and economic conditions.
- **Cultural programming** celebrating Africa's artistic diversity through music, dance, and artistic performances.

# 03.

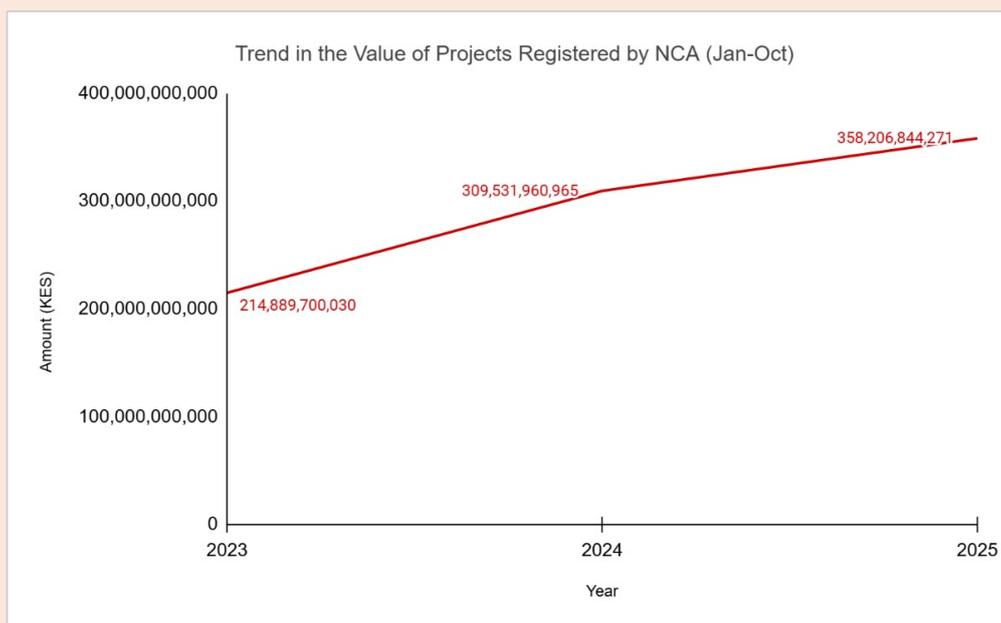
## Development Control

### 3.1. Development Applications

#### National Construction Authority

In the period January to October 2025, the National Construction Authority (NCA) registered **4,687 projects** across the country, a **14% increase** from 4,124 in 2024. The majority of these were residential projects, accounting for 70%, followed by commercial (16%) and mixed-use (6%), with a combined value of **KES 358 million**, representing a 16% increase from the previous year.

Figure 3.1: Value of NCA Registered Projects (2023-2025)



Source: National Construction Authority, 2025



(NCA) registered **4,687 projects** across the country, a **14% increase** from **4,124** in 2024

This underscores the steady expansion of the construction sector, fueled by Kenya’s rapid urbanization rate of 4.4% per year and the growing demand for housing, particularly across urban and peri-urban areas. Residential developments continue to dominate the market, accounting for 3,285 of the 4,687 projects recorded, an ongoing trend highlighted in the 2023 and 2024 Status of the Built Environment Reports and illustrated in Table 1.4.

Table 3.1: Trend in the number of Approvals Issued per Development Type from 2023-2025

Type of Development	No. of Approvals Issued		
	2023	2024	2025
Residential	1,821	2,853	3,285
Mixed-use	1,006	291	262
Commercial	503	620	768
Others	24	360	372
<b>Total</b>	<b>3,354</b>	<b>4,124</b>	<b>4,687</b>

Source: National Construction Authority, 2025

In 2025, 1,125 applications were rejected due to inadequate documentation. A similar pattern was observed in 2024, when 1,193 applications were returned for the same reason. This persistent trend highlights the need for stronger compliance and improved adherence to regulatory requirements by applicants.

### 3.2. Development Control Approvals

Kenya’s development control framework is anchored in the Physical and Land Use Planning Act (PLUPA), 2019, which assigns the responsibility for development fees to developers under Section 63. Counties must Gazette regulations specifying fee triggers, rates, and waiver terms, and where fees are waived, Section 63 empowers county executives to require developers to undertake public infrastructure improvements such as access roads, drainage, and green spaces. This ensures private development contributes directly to public benefit.

Approvals operate through a two-tier system. The primary tier, mandated by Section 60, requires circulation of development applications to internal county departments of planning, environment, roads, and public health, whose reports inform initial approval. However, this stage is often constrained within county structures, omitting early engagement with external infrastructure agencies whose mandates strongly influence project feasibility. The secondary tier consists of conditions requiring

developers to secure approvals from KURA, KPLC, KENHA, NEMA, and Water Service Providers, covering road interfaces, electricity distribution, highway safety, environmental licensing, and water and sewerage capacity. Delays often arise when such conditions are introduced late. Strengthening early coordination among counties, utilities, and national agencies is essential to delivering predictable, efficient development control.

Following AAK’s continuous advocacy to automate and enhance development control systems in Kenya, the Association conducted a survey to understand members’ experiences in obtaining approvals across counties. A total of 32 members participated, of which 71% Architects, 19% Civil/Structural Engineers, and 10% Town Planners. Of these, 34% had submitted applications in Nairobi County, 25% in Kiambu, and 6% each in Kisumu, Machakos, and Uasin Gishu. Additionally, responses were also received from Turkana, Kirinyaga, Siaya, Kakamega, Kitui, Nyeri, and Bungoma counties.



In 2025, **1,125 applications** were rejected due to inadequate documentation. A similar pattern was observed in 2024, when **1,193 applications were returned for the same reason**

## i Nairobi County

Between January and October 2025, Nairobi City County received **1,693** development approval applications, a **4% decline** from 1,761 in 2024 and continuing the downward trend from 1,827 in 2023. The total project value of these developments stood at **KES 187 billion**, a significant **31% decrease** from

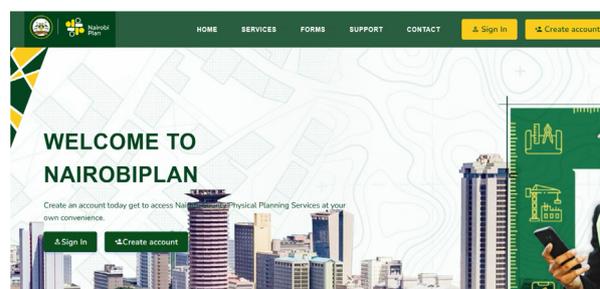
KES 273 billion in 2024. Similarly, approval revenues fell to KES 1.13 billion, reflecting a KES 537 million decrease from the previous year. The economic impact of this decline is further illustrated by KNBS data showing that, in January 2025 alone, approved building plan values in Nairobi dropped to KES 8.6 billion, underscoring reduced construction in the city.

Table 3.2: Summary of Development Control Applications (APPL.), Fees, and Project Value

MONTH	2023			2024			2025		
	APPL.	FEES (KES)	VALUE (KES)	APPL.	FEES (KES)	VALUE (KES)	APPL.	FEES (KES)	VALUE (KES)
JAN	80	36,330,100	12,884,819,500	134	112,854,062	93,520,949,151	109	72,982,326	9,922,993,335
FEB	187	136,667,701	18,437,517,120	100	99,384,021	12,373,737,870	289	184,702,298	20,880,517,073
MAR	154	46,588,692	12,263,732,650	299	232,996,350	25,279,087,072	119	100,820,144	16,386,019,222
APR	189	372,992,323	11,038,994,603	-	-	-	159	57,322,004	18,345,291,465
MAY	197	543,104,838	8,963,778,240	-	-	-	156	139,118,088	20,697,442,080
JUN	44	6,945,241	1,396,346,000	417	317,826,484	50,851,251,192	133	68,574,765	7,018,928,750
JUL	330	184,292,560	33,834,611,375	129	126,422,116	17,300,775,230	243	133,396,290	24,269,275,887
AUG	304	206,583,047	32,891,109,878	158	246,373,345	17,099,413,356	196	146,330,567	17,914,029,880
SEP	148	68,605,074	10,865,690,350	250	311,704,410	26,062,454,009	190	136,188,556	39,175,104,005
OCT	194	222,118,853	17,820,795,292	274	219,873,702	30,544,316,591	99	90,618,715	12,374,423,290
<b>TOTAL</b>	<b>1,827</b>	<b>1,824,228,429</b>	<b>160,397,395,008</b>	<b>1,761</b>	<b>1,667,434,490</b>	<b>273,031,984,471</b>	<b>1,693</b>	<b>1,130,053,753</b>	<b>186,984,024,987</b>

Source: Nairobi City County Government, 2025.

Of the 2025 applications, 94% were approved, while 6% were deferred or rejected. The county government noted breaches of development control guidelines and recurring non-compliance issues during submissions, including failure to meet parking requirements, disregard for building lines and setbacks, inadequate window clearance and light penetration angles, non-compliance with minimum window-to-room-size ratios, and violations of zoning regulations and policies.



### AAK Members' Experience with the Nairobi Planning and Development Management System (NPDMS)

Respondents indicated the average time to obtain approvals was 13.1 weeks, with approval durations ranging from 2 to 25 weeks. The highest value of a pending project was KES 1 billion. AAK members cited several challenges in securing development permits in the county. Key issues included frequent downtime of the NPDMS system, limited access to information on requirements and application status, poor interdepartmental coordination, and entrenched corruption. Requests for unofficial "facilitation" were common, as was also noted in the [2024 SBE report](#), particularly at the initial submission stage. Some of the recommended actions included improving the NPDMS system and strengthening personnel's technical capacity to enhance overall efficiency.

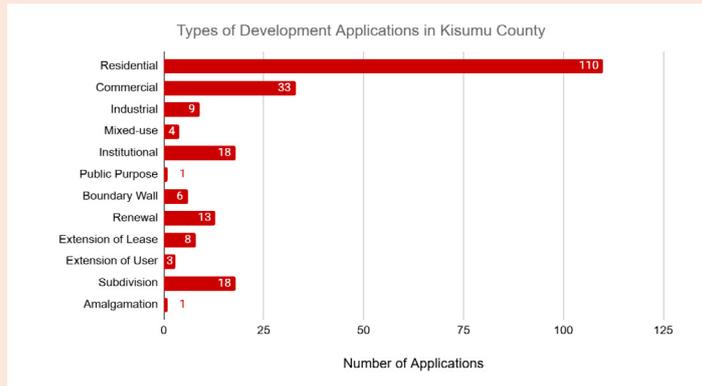


Nairobi City County received **1,693** development approval applications, a **4% decline from 1,761 in 2024** and continuing the downward trend from **1,827 in 2023**

**ii Kisumu County**

The County Government of Kisumu received 203 development applications between January and October 2025, generating submission fees totaling **KES 11.4 million**. This reflects a **24% increase** from the KES 9.2 million received in 2024. Of these applications, 81% were approved while 19% were deferred. There were no declined applications during this period. Furthermore, the majority of applications (110) were for residential developments, followed by commercial developments (33), as shown in Figure 1.4.

Figure 3.2: Types of development applications submitted to Kisumu County in 2025



Source: County Government of Kisumu, 2025

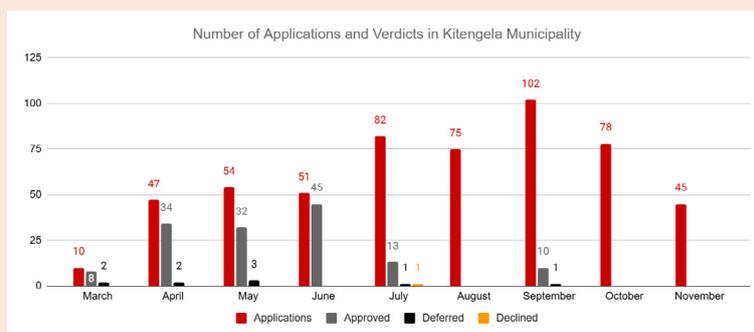
*AAK Members’ Experience with the Kisumu Development Control Permitting*

As highlighted in the [2024 SBE report](#), the Kisumu County Planning and Development Management System (PDMS) still remains non-functional. Consequently, respondents rated the current process as ineffective, citing poor interdepartmental coordination and slow response times. One member reported receiving no response to an application submitted in 2022. Corruption was also raised as a major concern, with unofficial “facilitation” requested at multiple stages. Conversely, some respondents noted that the county was responsive in certain cases. Nonetheless, a consistent recommendation was the need to curb corruption and eliminate requests for unofficial “facilitation”.

**iii Kajiado County**

Kajiado County consists of three municipalities i.e., Kajiado, Kitengela and Ngong. AAK managed to obtain data only from Kitengela Municipality. From January to November 2025, the Kitengela municipality received 499 development applications, generating a total of KES 41.7 million in submission fees. During this period, 142 applications were approved, representing 28% of the total submitted, with 1.8% deferred. A total of 151 were processed, with 366 remaining pending.

Figure 3.3: Submitted applications vs approvals issued in Kitengela Municipality



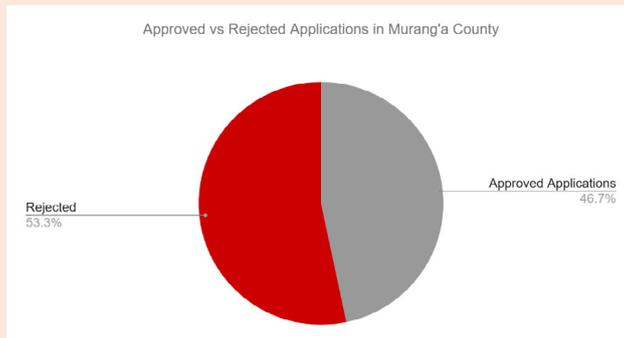
Source: Kitengela Municipality, 2025

The Kajiado Electronic Development Application Management System (KeDAMS) experienced downtime earlier in the year, requiring applicants to manually resubmit their applications. This disruption significantly hampered service delivery and created uncertainty for applicants with pending submissions on the system, underscoring the importance of maintaining reliable digital systems, timely upgrades, and robust contingency plans to ensure continuity in e-permitting services.

**iv. Murang’a County**

Murang’a County received 452 applications between January and October 2025, a slight increase from 437 in 2024. Of these, 211 were approved, while 241 were deferred or rejected. According to the County Government, the high number of non-approvals stemmed from frequent breaches of development control guidelines, including non-compliance with setback requirements, plot ratios, and enforcement notices.

Figure 3.4: Approved vs rejected applications in Murang’a County



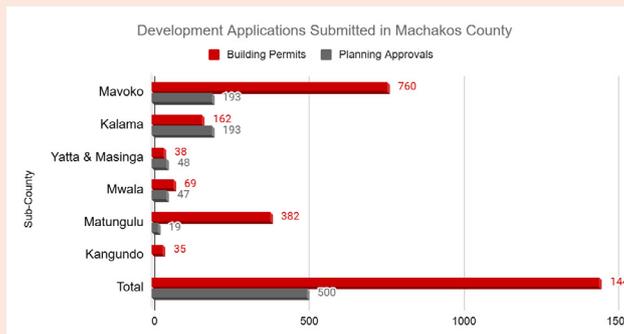
Source: Murang’a County Government, 2025

In addition, 241 applications for subdivision were submitted, while 171 lease applications, which covered change of user, extensions, and renewals, were received. During the same period, only one occupation certificate was issued.

**v. Machakos County**

From January to October 2025, Machakos County received a total of 1,946 development applications, a substantial rise compared to the 490 applications submitted during the same period in 2024. Of these, 74% were for building permits with 26% accounting for planning approvals. Among the six sub-counties, Mavoko accounted for the largest share at 49%, followed by Matungulu at 21%. Kangundo recorded the lowest applications, representing just 3% of all submissions. Some of the most frequently violated development control guidelines and recurring non-compliance issues include the lack of designated solid waste management areas, missing or expired registration stamps, inadequate parking provisions, disregard for setback requirements, failure to incorporate mandatory fire safety measures in high-rise buildings, insufficient headroom, exceeding allowable plot coverage, and poorly detailed septic and drainage designs.

Figure 3.5: Number of development applications submitted across the 6 sub-counties



Source: County Government of Machakos, 2025

### AAK Members' Experience with the Machakos Development Control Permitting

Members who submitted development applications in Machakos County reported mixed experiences with the approval process. Some noted that approvals could only be obtained through unofficial facilitation, while others found the process ineffective even after providing such payments, often being required to pay at the initial stage of submission. A recurring challenge identified was the lack of an online platform, forcing applicants to courier documents physically to county offices, which significantly slows the process and increases the risk of errors or lost documents.

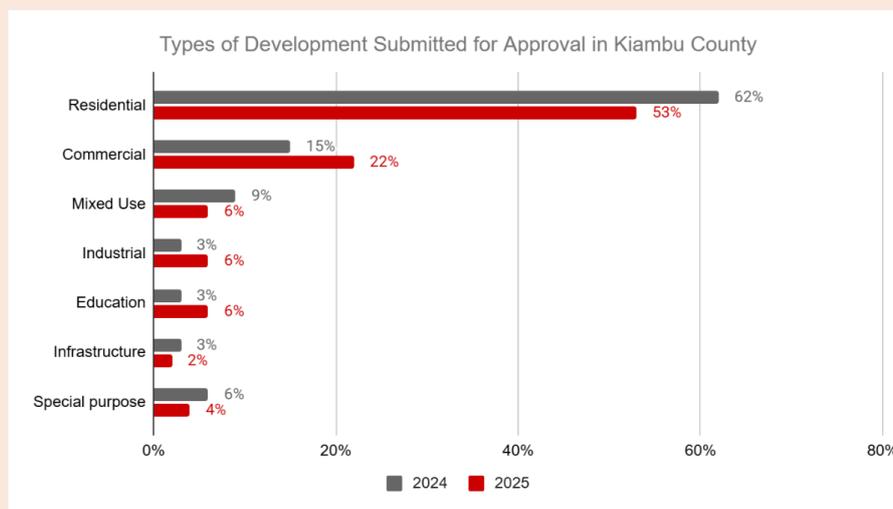
To improve the efficiency, transparency, and accountability of the county's development approval system, members recommended several measures. These included assessing the performance and effectiveness of liaison committees responsible for handling grievances, as developers who flout building code regulations are often not adequately supervised. Reports made to these committees frequently go unanswered, leaving violations unaddressed. Strengthening monitoring mechanisms, establishing clear timelines for responses, and implementing a digital submission and tracking system were suggested as critical steps to streamline approvals and ensure compliance and professional integrity are upheld in the county.

### vi. Kiambu County

#### AAK Members' Experience with the Kiambu Development Control Permitting

Several AAK members submitted planning approvals, building permits, and structural engineering applications in Kiambu County, totaling 49 submissions. Residential projects formed the largest share of these applications at 53%. However, compared to the same period in 2024, the proportion of residential projects declined in 2025, while commercial developments registered a notable increase, as illustrated in Figure 2.10.

Figure 3.6: Types of development applications submitted in Kiambu County



The average time taken to obtain development approval across the sampled projects was approximately 9.1 weeks. The approval duration varied significantly, with the shortest processing time at just 2 weeks and the longest at 15 weeks. Notably, the highest value of pending projects stood at KES 100 million, highlighting a substantial backlog and significant potential economic activity awaiting completion in the county.

Members unanimously noted that Kiambu County's reversion to a manual permitting system in 2023 has made the approval process highly ineffective. They reported frequent delays caused by understaffing, slow relay of review comments, and the need for numerous in-person follow-ups, all of which extend processing timelines. Several members also raised concerns about unprofessional conduct by certain officers and highlighted rampant corruption, particularly for commercial projects. Additionally, 88% of members reported having to provide unofficial "facilitation" to secure development approvals in Kiambu County. These payments were most commonly solicited during initial submission and technical review, with some indicating it occurred at multiple stages. Overall, the manual system was

described as significantly slower, less transparent, and more prone to discretionary behaviour than the digital platform it replaced.

Key recommendations included employing dedicated staff with qualifications aligned to their roles, for example, planners reviewing planning matters and architects handling architectural approvals, to ensure technical accuracy and accountability. Members called for a return to a fully digital approval system supported by clear, written plans and guidelines on setbacks, road sizes, and building lines, rather than relying on the current manual process. The system should allow for online submission of applications while enabling queries to be tracked and automatically resolved. Additionally, members stressed that development control should not be treated primarily as a revenue-collection mechanism and suggested that the county provide a physical office address to ensure transparency and public access. Overall, a working, automated system with clear protocols was seen as essential to improve efficiency, reduce corruption, and restore public confidence in the development approval process in Kiambu County.

### Other Counties' Members Experiences

**Bungoma County:** The development approval process was rated as ineffective, with a relatively slow response rate. In contrast, interdepartmental coordination was ranked as excellent. However, corruption concerns were raised, with requests for unofficial "facilitation" during the technical review stage.

**Nyeri County:** The approval process was considered effective, with strong interdepartmental coordination and no requests for "facilitation". The county also demonstrated a good response rate. Challenges included applicants having to travel long distances between departments and make payments at a separate location.

**Kitui County:** The process was rated as very ineffective. Interdepartmental coordination was fair, with approvals typically requiring one revision cycle. Unofficial "facilitation" was often requested, particularly at the initial submission stage.

**Kakamega County:** Approvals were generally obtained within eight weeks, and the approval system was rated effective. Coordination across departments was effective, despite their limited numbers. Conversely, requests for unofficial facilitation were noted, especially at the initial submission stage.

**Siaya County:** The process was reported to be largely unresponsive, with requests for unofficial facilitation noted, similar to Kirinyaga. Some key recommendations included improving the technical capacity of county staff to enhance application handling.

### 3.3. How Digital Permitting Can Unlock County Development in Kenya

As of 2025, only eight counties (Nairobi, Mombasa, Kisumu, Nakuru, Kajiado, Machakos, Kilifi, and Murang'a) have online development permitting systems, representing just 17% of Kenya's 47 counties according to county gazette records. These digital platforms have significantly reduced processing times from 9-26+ weeks under manual systems to 3-8 weeks with digital systems, though significant challenges remain.

The most substantial failure occurred in Kiambu County, where the eDAMS platform was rolled back due to developer outrage over corruption allegations, leaving it defunct throughout 2025, representing a significant setback for Kenya's second-largest revenue-generating county. Similarly, significant downtime was noted on online approval systems in Nairobi and Mombasa, while Nakuru, Kajiado, Machakos, and Kisumu were officially offline at the time of the report's publication.

Processing delays remain the biggest challenge

affecting development control. The economic impact is measurable, for example, in January 2025, approved building plan values in Nairobi fell to KES 8.6 billion according to the Kenya National Bureau of Statistics. This is the lowest figure on record, representing not just lost county revenue but significant damage to the construction sector and related industries. These challenges underscore the critical need for transparent, efficient digital systems supported by robust governance frameworks to unlock development potential while maintaining planning integrity.

AAK has championed the transformation of Kenya's development control processes through an integrated One-Stop-Shop (OSS) model. This initiative aims to streamline approvals by consolidating multi-agency processes into a single submission and payment platform for all 47 counties, building on the successes of other national one-stop-shop initiatives such as Huduma Centers, Integrated Financial Management Information Systems (IFMIS), eCitizen, and the electronic Tax Invoice Management System (eTIMS)

#### Key initiatives by AAK to promote the OSS

- **2002-2020:** [Doing Business Survey](#) by The World Bank. AAK's main contribution was on Dealing with Construction Permits.
- **2011:** Conducted a [study on Development Control Systems](#) in Kenya, highlighting the strengths, weaknesses, opportunities, and threats of development control in Kenya.
- **2011:** Supported Nairobi's first automated development control system following the World Bank's *Doing Business* survey insights.
- **2018:** Advocated for OSS deployment through [a study on the Automation of Development Control Systems in Kajiado, Machakos, and Nakuru Counties](#), and the counties approached to be supported.
- **2020:** Published [a feasibility report](#) confirming OSS as a game-changer for reducing approval timelines (previously 8–300 weeks).
- **2022–2023:** [Conducted user experience surveys on Nairobi's NPDMS](#), revealing inefficiencies and prompting calls for centralized systems.
- **2023-2025:** Status of the Built Environment Reports [2023](#), [2024](#) and 2025 highlighted persistent challenges experienced by AAK members such as corruption, inconsistent processes, and system downtimes, underscoring the need for harmonization and automation.
- **2024:** Submitted a memorandum to the State Department of Public Works on the proposed development of an integrated national e-building approval and development system in Kenya

Some of the key recommendations include aligning the OSS with updated spatial plans, PLUPA (2019), UACA (2011), CGA (2012), the Physical and Land Use Planning Handbook 2025 and the Building Code 2024, recognizing that automation alone cannot fix inefficiencies if outdated plans and standards persist. The system should also standardize fees and approval timelines across counties, integrate agencies such as NEMA, NLC, and KPLC to enable end-to-end lifecycle tracking, and adopt innovative technologies like BIM and AI to enhance accuracy and efficiency. Additionally, minimizing human interaction remains essential to reducing delays, discretion, and

corruption within the permitting process.

Rwanda ranked 3rd globally in the World Bank's B-READY 2024 report for successfully automating construction permitting processes, owing to its robust planning instruments. These include the National Land Use and Development Master Plan (NLUDMP) 2020–2050, zoning regulations, and District Land Use Plans (DLUPs), which collectively guide development decisions. In contrast, Kenya lacks harmonized frameworks, and approvals are often issued arbitrarily by county officials, leading to inefficiencies, unpredictability, and opportunities for corruption.

### 3.4. Administrative Bottlenecks? A Look into Executive Control over Approvals

Development approval processes in several counties have become flashpoints for allegations of inefficiency and potential abuse of executive authority. In Kiambu County, real estate developers have questioned the centralization of approval authority under the County Executive Committee Member (CECM) for Lands, Housing, Physical Planning, Municipal Administration, and Urban Development, advocating for greater delegation to technical consultants to expedite processing timelines. Industry stakeholders have engaged county leadership in dialogue while signaling willingness to pursue judicial review should administrative channels prove insufficient, reflecting broader tensions about balancing executive oversight with administrative efficiency in county-level development control.

More serious allegations have emerged from Mombasa County, where the Architectural Association of Kenya (AAK) - Coast Branch has raised concerns suggesting systemic breakdown in the CECM for Lands, Urban Planning, Housing, and Serikali Mtaani's oversight. From October 2025, the AAK documented allegations of irregular solicitation of unauthorized levies to expedite approvals through the eDAMS system,

fraudulent double invoicing, and manipulation of official invoice amounts allegedly involving collusion between some professionals and county officials. These irregularities prompted the AAK to petition the County Assembly for intervention and demand an independent audit of the entire eDAMS approval process, citing concerns that widespread corruption and systemic abuse compromise the integrity and safety of the built environment.

Both cases highlight a critical gap in dispute-resolution mechanisms before escalation to external bodies. Section 76 of the *Physical and Land Use Planning Act, 2019*, mandates the establishment of County Liaison Committees in every county to provide a quick, non-adversarial forum for resolving issues such as alleged delays and fees. Although all counties are legally mandated to establish a liaison committee, the Mombasa CECM's admission before the Mombasa County Assembly on 6<sup>th</sup> November 2025 that one does not exist strengthens grounds for future litigation and professional appeals, particularly concerning the enforcement of the 60-day approval deadline and the legality of County planning decisions.

## Experience of AAK Representatives in County Physical and Land Use Liaison Committees

Feedback from AAK representatives across six counties, Kisumu, Marsabit, Embu, Kajiado, Kiambu, and Nairobi (ended 2024), reveals significant inconsistencies in how County Physical and Land Use Planning Liaison Committees are constituted, operationalized, and supported. The duration of service varied, with most representatives having served for 1–2 years. However, two counties, Kisumu (appointed in October 2025) and Marsabit (appointed in January 2025), did not convene any meetings despite appointing representatives, highlighting a fundamental breakdown in committee activation. Kajiado County similarly remains non-operational, having held only three symposia and a kick-off meeting in June, with no formal committee sittings to date, while Nairobi County has been non-functional throughout 2025 due to non-facilitation from the county government.

Across the counties where meetings took place, they were generally irregular. Kiambu held meetings only intermittently. As a result, predictability remained a challenge in most jurisdictions, undermining the committees' statutory mandate in planning oversight and dispute resolution. Communication levels also varied widely: while Kiambu provided extremely clear communication on meeting dates and agendas, Kajiado offered inconsistent communication, and Marsabit and Kisumu offered none.

A consistent finding across counties with active committees is that the committees' recommendations were rarely, if ever, acted upon. In all counties where this question applied, representatives reported that recommendations were either not acted upon at all or that the extent was "never." This corresponds to very low ratings of committee effectiveness, and other evidence indicates that the committees did not start the activities they were mandated to deliver.

The challenges reported reveal deep systemic issues. Representatives cited a lack of communication, poor public awareness, irregular meetings, committees constituted contrary to PLUPA requirements, the absence of allowances or designated meeting rooms, and complete inaction on rulings. More complex governance failures were highlighted in Nairobi, including jurisdictional overlaps, unresolved land ownership disputes, long statutory timelines, register maintenance issues, enforcement gaps, backlog in appeals, absence of accountability, misuse of the committee mechanism to "buy time," and concerns about the practical implications of decisions. In Kajiado County, the committee's membership is dominated by county officials, while several of the required stakeholder groups were not represented.

Across all counties, the recommendations underscore the need for structural reforms. Respondents called for better communication, proper constitution of committees in line with PLUPA, adequate funding, dedicated secretariats, designated meeting facilities, independent budgets, and

meaningful powers to ensure implementation of rulings. Others emphasized the broader need for authenticity, transparency, improved planning practice, and re-establishment of strong planning directorates.

The structural deficiencies in PLUPA's liaison committee framework explain their widespread non-functionality and underscore the urgency of institutional reform. Under the current statute, both National and County liaison committees are controlled by the very executive authorities they are mandated to review, creating an inherent conflict of interest that violates fundamental principles of separation of powers. Cabinet Secretaries and County Executive Committee Members exercise monopolistic control over these oversight bodies through three critical levers: appointing all committee members without independent vetting, providing secretariat services that control information flow and administrative operations, and allocating funding that determines operational capacity. This executive capture transforms committees designed as independent oversight mechanisms into extensions of the authorities they are meant to scrutinize, rendering them structurally incapable of providing impartial adjudication when developers challenge executive decisions on approvals, timelines, or fees. The absence of functional liaison committees in counties like Mombasa is not merely administrative negligence but a predictable outcome of a governance architecture that incentivizes executive authorities to avoid establishing bodies that could constrain their discretionary power.

Recognizing these systemic failures, the Architectural Association of Kenya has proposed comprehensive structural reforms as part of the ongoing harmonization of Planning Laws. The AAK advocates for the complete transfer of both the National and County liaison committees from executive control to the Judiciary, reconstituting them as independent quasi-judicial tribunals with constitutional authority under Article 159. This transformation would fundamentally restructure the appointment process by vesting authority in the Judicial Service Commission rather than executive officers, ensuring members are selected based on professional competence rather than political alignment. Administrative independence would be secured through secretariat services provided by County Public Service Boards rather than executive offices, eliminating the information asymmetry and procedural manipulation that currently characterizes committee operations. Most critically, the proposal calls for ring-fenced funding mechanisms that insulate tribunal operations from executive budgetary discretion, guaranteeing the resources necessary for consistent, professional adjudication. By establishing clear accountability to the Judiciary rather than the executive, this reform framework would create genuinely independent oversight bodies capable of providing the quick, non-adversarial dispute resolution that PLUPA envisions while restoring public confidence in the integrity of Kenya's planning approval system.



### 3.5. Building Safety and Compliance

In 2025, the National Building Inspectorate (NBI) audited **396 buildings** across the country – a sharp decline from the 20,649 developments inspected in 2024, according to the [2024 SBE Report](#).

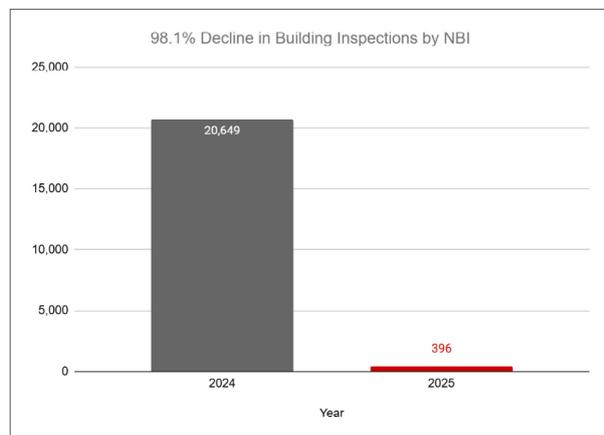


Figure 3.7: Decline in the number of building inspections by NBI.

Despite this, 87% of the audited developments still failed to comply with building standards or lacked requisite approvals. In 2024, 4.7% of these buildings were classified as dangerous, 56.5% as unsafe, and 1% as having structural integrity issues.

According to the National Building Inspectorate, approximately 80% of construction activity occurs without the involvement of registered professionals, suggesting that non-compliance

remains widespread. This underscores systemic weaknesses in development control and highlights the urgent need for stronger regulatory oversight, increased participation of licensed built-environment professionals, and the adoption of a One-Stop Shop (OSS) system for county-level permitting to safeguard public safety and improve construction quality.

The National Construction Authority (NCA), in its mandate to oversee construction activities and ensure they meet safety and quality standards, issued 13,348 suspension-of-work notices in 2025. Additionally, 24% (1,125) of applications for project registration were rejected, while 4,687 were approved as compliant.

Historically, residential developments account for the highest number of non-compliant buildings. The [AAK Mulika Mjengo Report 2025](#) highlighted recurring issues of non-compliance with building regulations; structural integrity issues; continued construction despite stop-work orders; absence of professional supervision; environmental degradation through improper effluent discharge, inadequate stormwater management, poor handling of solid and construction waste, and encroachment onto riparian, railway, road, pipeline, and electricity reserves. Two buildings were decommissioned in 2025, including an 11-storey structure in Mombasa, demolished by the Kenya Defense Forces on April 9<sup>th</sup> following insufficient geotechnical surveys, unsupervised construction, and an unapproved borehole, and structural failure caused by the drilling of an unapproved borehole.



11-storey building demolished in Mombasa in April 2025

6 building collapses were recorded across Nairobi, Mombasa, and Kisii counties, alongside several boundary-wall and slab collapses at active construction sites. In Nairobi, two collapses occurred in the Parklands area, resulting in fatalities. Site inspections by the Mulika Mjengo team revealed recurring patterns of non-compliance, lack of professional oversight, and weak enforcement. Poor planning and inadequate regulatory action continue to fuel unsafe, haphazard development, compromising public safety and the overall quality of construction.

**6** building collapses recorded in Nairobi, Mombasa, Kisii.



Wall collapse along Suswa Road, Parklands and Mulika Mjengo team conducting an inspection on 13<sup>th</sup> May 2025



*Slab collapse at an active construction site at the intersection of 3<sup>rd</sup> Parklands Avenue and Mpaka Road*

To enhance construction oversight, AAK has been incorporated into the Multi-Sectoral Agencies Coordinating Committee (MSACC), a collaboration that includes the NCA and NBI. AAK's involvement strengthens regulatory coordination, promotes accountability among developers, and advances policy reforms to improve compliance in the construction sector.

### 3.6. Engagement of Residents in Development Control Processes

According to the [2024 SBE report](#), only 38% of residents in urban areas have participated in development control procedures through organized forums or associations. The Kenya Alliance of Resident Associations (KARA) records that there are over 1,500 registered Resident Associations in Kenya, each typically comprising at least 20 members. These platforms offer a powerful avenue for citizens to shape their neighborhoods, advocate for sustainable

development, and ensure compliance with zoning and environmental standards.

KARA's membership constitutes 573 of these Resident Associations distributed across 12 counties, especially within the Nairobi Metropolitan Area and City Counties, suggesting an increasing interest among organized community groups in these rapidly urbanizing areas.

NBI audited

**396**

buildings in 2025

(↓ from 20,649 in 2024)

**87%**

failed to meet standards or lacked approvals.

NCA issued

**13,348**

suspension-of-work notices in 2025.

Table 3.3: KARA Bona-Fide Member Resident Associations by Counties

County	Number of Resident Associations
Nairobi	213
Kiambu	22
Kajiado	11
Machakos	9
Muranga	5
Nakuru	71
Kisumu	76
Uasin Gishu	75
Embu	13
Nyeri	11
Mombasa	59
Kilifi	8
<b>Total</b>	<b>573</b>

Source: Kenya Alliance of Resident Associations (KARA)

Across Kenya, county governments are increasingly recognizing the value of involving organized community groups, particularly Residents Associations (RAs), in development control procedures. A growing number of counties now require developers to obtain Letters of No Objection from local RAs before approving development applications. This shift marks a significant step toward inclusive urban governance and participatory planning.

Counties such as Nairobi, Kajiado, and Machakos have adopted such mechanisms, though each county's approach varies in formality and implementation. Nairobi has legislated RA engagement through the Community and Neighborhood Associations Engagement Act (2016), while Kajiado previously signed a Memorandum of Understanding with its RA Alliance (later revoked). Machakos has adopted informal but active RA involvement in planning forums.

The Letters of No Objection serve as community endorsements or objections to proposed developments, ensuring that local voices are considered before approvals are granted. However, the procedures vary significantly across counties.

Table 3.4: Issuance of letters of no objection across various counties

County	Procedure for Letter of No Objection	Notes
<b>Nairobi</b>	<p>Developers are required to engage the relevant RA within the project area and document meaningful engagement, which is verifiable and supervised by Sub-County Administrators and the Sub-County Physical Planner.</p> <p>The Sub-County submits the Letter of No Objection for endorsement by the Sub-County Physical Planner. The County Planning Department then includes it in the development application checklist.</p>	Anchored in the Community and Neighborhood Associations Engagement Act (2016). Subcounty and county administrators play a key role in vetting and validating RA input.
<b>Kajiado (Revoked)</b>	Developers were to submit proposals to the RA, which would review and issue a Letter of No Objection. This letter is submitted alongside the development application to the county. Although the process was formalized through an MoU, it was later revoked due to concerns about transparency and representation	The process continues informally in some areas, but lacks legal backing.
<b>Machakos</b>	Engagement with RAs is encouraged but not mandatory. Developers may voluntarily seek Letters of No Objection, and county officials may consider them during the approval process.	No formal policy exists, but RA involvement is active and growing.
<b>Kiambu</b>	The county uses collaborative planning forums where RA feedback is considered. No formal requirement for No Objection letters exists, but community input is valued during zoning and development discussions.	Engagement is informal and varies by subcounty.

Source: AAK, 2025



This trend presents an opportunity for other counties to enhance citizen participation in development control procedures. However, without proper checks and balances, risks such as elite capture, exclusion of unorganized residents, and subjective decision-making may arise. Therefore, standardized engagement frameworks under the Urban Areas and Cities Act (2011) are essential to guide and safeguard these participatory processes.

Kenya's legal framework provides a strong foundation for public participation in planning and development control, although the role of Residents Associations (RAs) remains largely implicit rather than formally regulated. The Constitution of Kenya (2010) establishes a broad legal requirement for public participation in governance, giving communities strong constitutional backing, though its provisions are general and non-specific. The Urban Areas and Cities Act (2011) reinforces citizen engagement by encouraging structured forums for urban governance, yet it does not directly define or empower Residents Associations within the planning process. The Physical and Land Use Planning Act (2019) provides for stakeholder engagement in development control and planning, supporting more inclusive decision-making, but its guidance on the formal roles and responsibilities of RAs remains limited. Meanwhile, the Societies Act (Cap 108) provides the registration framework that legally recognizes Residents

Associations, although it contains no planning-specific provisions. As a result, while citizens are broadly empowered by national law, there is still no unified legislative framework that clearly articulates how RAs should participate in planning, influencing their effectiveness and consistency across the country.

The Public Participation Bill, 2025, currently under parliamentary review, seeks to operationalize constitutional provisions on citizen engagement. It proposes establishing a Registrar of Public Participation, responsible for certifying compliance and maintaining public registers of participation processes.

AAK emphasizes that Letters of No Objection should be anchored on clear, community-approved planning frameworks. Specifically, counties should prioritize the preparation and implementation of Local Physical Development Plans (LPDPs), which would provide residents with an objective, legally recognized basis for issuing Letters of No Objection. Additionally, there is a need to entrench professionalism in development control processes and address critical human and financial resource gaps within county planning departments. This will ensure that Resident Associations' involvement complements, not replaces, professional oversight, resulting in more transparent, predictable, and accountable planning outcomes.

# 04.

## Affordable Housing Programme

Driven by a rapidly increasing population, Kenya is urbanizing at a rate of 4.4% per year, intensifying an already significant housing deficit estimated at about 2 million units. To address this gap and increase homeownership, the national government, through the Affordable Housing Programme (AHP), set a target of delivering 250,000 housing units annually.

### 4.1. Government Entities Involved in the AHP

#### i. State Department for Housing and Urban Development (SDHUD)

This is the lead agency responsible for policy formulation, coordination, and oversight of the AHP. SDHUD guides implementation, sets standards and regulations, and issues a call for strategic partners to support AHP delivery. The last call issued in 2023 classified partners into four categories based on their capacity to deliver: over 100,000 units; 10,000–100,000 units; 1,000–9,999 units; and fewer than 1,000 units.

#### ii. National Housing Corporation (NHC)

Established under the Housing Act, NHC is the government's primary implementing authority for housing policy and is responsible for constructing and delivering affordable housing units under the AHP. It also provides and manages financing structures to support housing delivery, including mortgages, tenant-purchase schemes, and long-term repayment models used within the AHP. In

addition, NHC is actively involved in developing low-cost, affordable housing projects, such as the Stoni Athi Affordable Housing Project in Mavoko, Machakos, and the Kanyakwar Phase III project in Kisumu County.

#### iii. Affordable Housing Board

Established under the Affordable Housing Act 2024, the Affordable Housing Board is the body responsible for managing, regulating, and guiding the nationwide implementation of the AHP. As provided by the Act, the Board oversees the Affordable Housing Fund, the development and off-take of AHP projects, institutional housing, and associated social and physical infrastructure. A review of the Boma Yangu website shows 122 Affordable Housing Programme (AHP) projects nationwide, comprising 90,105 units. Of these, 5 projects are completed, 116 projects are ongoing, and one is fully sold out. Notably, 39 projects have not disclosed their number of unit counts. This data can be accessed [here](#).

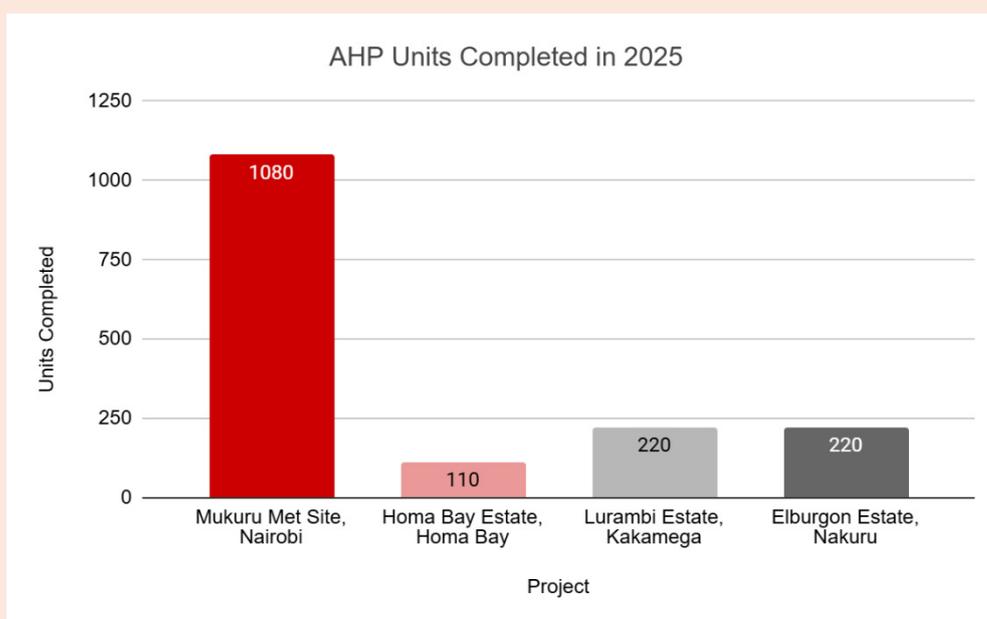


In 2025, **1,630 units** were completed between January and October

## 4.2. Affordable Housing Programme 2025 Progress Report

As of October 2025, a total of 3,611 AHP units have been completed since the current administration took office in September 2022. In 2025 alone, 1,630 units were completed between January and October, in the Mukuru Met Site (Nairobi), Homa Bay Estate (Homa Bay), Lurambi Estate (Kakamega), and Elburgon Estate (Nakuru).

Figure 4.1: No. of AHP Units completed in 2025



Source: State Department of Housing and Urban Development, 2025

Currently, there are 307 ongoing projects across the country, comprising 214,057 housing units. Of these, 77% are Affordable Housing Programme (AHP) units, 10% are student housing, 7% are institutional staff housing, and 6% are private projects benefiting from VAT exemptions. An additional 76,284 units are yet to be launched.

Table 4.1: Types of projects that are ongoing across the country under the AHP

No.	Project Type	No. of Units
1	AHP Units	163,455
2	Institutional Staff Housing	15,849
3	Student Housing	21,131
4	Private VAT Exemptions	13,622
	<b>TOTAL</b>	<b>214,057</b>

Source: State Department of Housing and Urban Development, 2025

Furthermore, construction of another 53,350 shelter and slum upgrading units is still ongoing. 4,888 units have also been advertised for sale to the public.

Figure 4.2: Mukuru Met Site AHP



Source: Boma Yangu, 2025

### 4.3. AAK Members' Experience in the Affordable Housing Programme Projects

Over the years, AAK has consistently championed the full involvement of built environment professionals in the Affordable Housing Programme (AHP). Some progress was made through the establishment of the Affordable Housing Forum, comprising AAK, IQSK, and IEK, which was envisioned as a platform for collaboration, technical guidance, and coordinated professional input. However, its potential remains largely unrealized. Although the Forum was constituted and an MoU for the three associations was signed, the MoU with the State Department for Housing and Urban Development has never been signed, and as a result, many of the proposed initiatives have not been operationalized, and the Forum has not functioned as intended.

In 2025, AAK undertook a survey to capture the experiences of members participating in AHP projects, particularly those who had acquired the AHP Charter from the Association. Their feedback revealed several systemic challenges. Many professionals cited stringent, often unclear prequalification requirements, coupled with limited communication about entry processes. Professional fees were frequently described as unsustainable due to non-adherence to the statu-

tory scale of fees. Concerns also emerged about uneven project distribution, with some firms assigned significant workloads while others received none. Members highlighted bureaucratic delays in approvals, contracting, and payment, as well as frequent scope changes and inconsistent documentation. Political interference, potential conflicts of interest, and gaps in technical capacity, especially in modern construction technologies and green building practices, also affected project delivery.

To address these concerns, members emphasized the need for more equitable and transparent project allocation, fair remuneration aligned with the regulatory framework, and streamlined approval and payment processes. Strengthening technical capacity through targeted training in sustainable design, project management, and innovative construction methods was also identified as a priority. Members further recommended improved coordination among stakeholders, stricter adherence to procurement and quality standards, and enhanced legal and contractual support to safeguard professional practice and ensure fairness across the AHP ecosystem.

# 05.

## Construction Finance

The construction industry in Kenya has continued to experience moderate shifts in material and operational costs, driven by local economic conditions, fuel price movements, and inflationary pressures. However, unlike previous years, currency stability has played a significant role in cushioning construction costs in 2025.

### 5.1. Cost of Construction Materials in 2025

#### Exchange Rate Stability

Since December 2024, the Kenyan shilling has remained relatively steady against the U.S. dollar. After appreciating to KES 129 per USD in December 2024, the shilling maintained this level throughout 2025, averaging approximately KES 129 per USD. This stability has helped prevent sharp increases in the cost of imported construction inputs, offering the sector a rare period of predictability compared to the fluctuations seen in 2023 and 2024.

#### Fuel Price Movements

Fuel remains a major determinant of project costs due to its influence on transportation and equipment operation. Petrol prices in 2025 fluctuated modestly

across the quarters: December 2024: KES 180.66 per litre, Q1 2025 (March): KES 176.58 per litre, Q2 2025 (June): KES 174.63 per litre, Q3 2025 (September): KES 184.52 per litre, Q4 2025 (December): KES 184.52 per litre. Although the first half of the year recorded slight reductions, the increase in the latter quarters raised haulage, logistics, and plant operation costs.

#### Cement Prices

Cement prices have remained on an upward trajectory over the last three years. Prices rose from KES 650 in December 2022, to KES 750 in December 2023, to KES. 830 in December 2024 and further to KES 850 by December 2025. These increases reflect higher production and energy costs, as well as general inflation.

Figure 5.1: Quarterly price of construction inputs

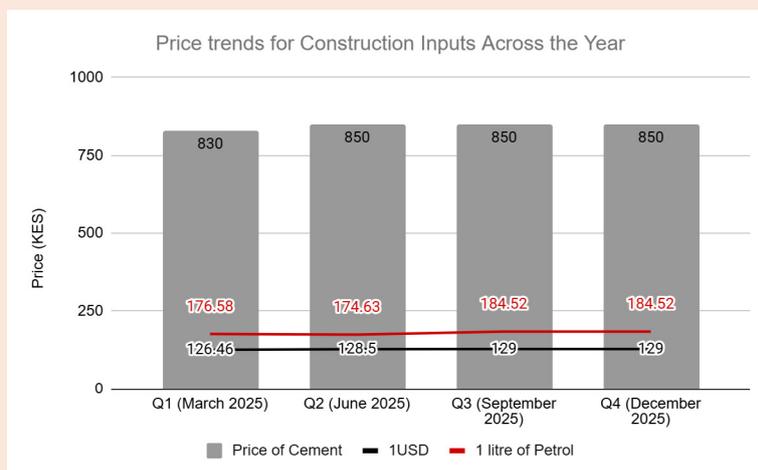
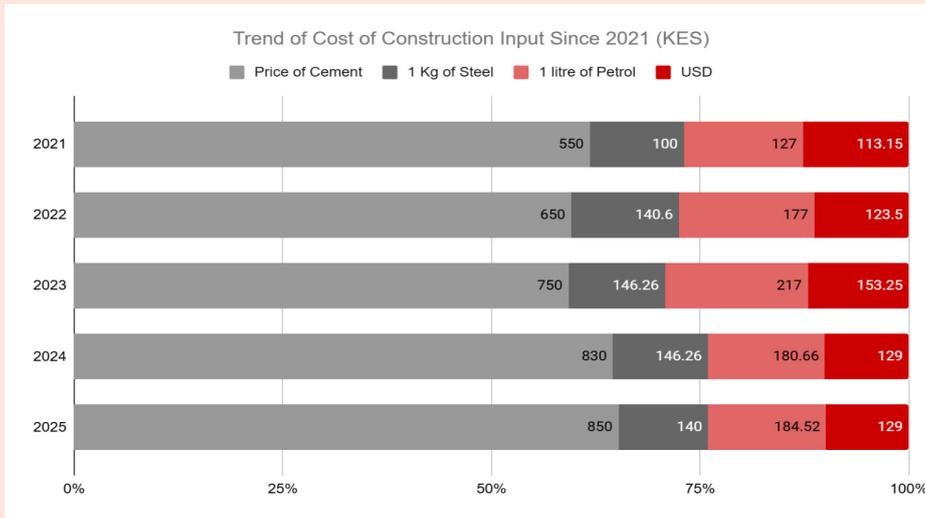


Figure 5.2: Cost of construction input trend 2021-2025



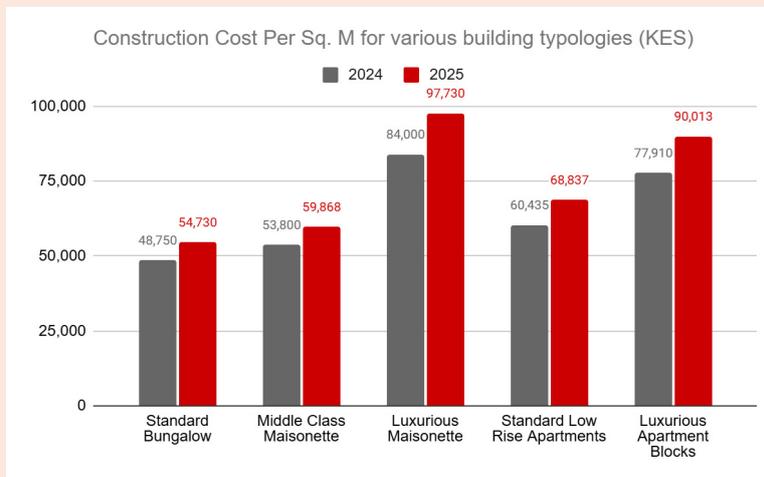
Source: AAK, 2025

**Construction Costs per Square Meter**

A study by Integrum Construction on 2025 construction costs in Nairobi indicates a continued rise in residential building costs compared to 2024 figures. Construction costs across all major residential building categories continued to rise between 2024 and 2025. The cost of constructing a Standard Bungalow increased from KES 48,750 per square meter in 2024 to KES 54,730 in 2025, representing a 12.27% rise. Middle Class Maisonettes recorded a more moderate increase of 11.28%, moving from KES 53,800 to KES 59,868 per square meter.

Higher-end units registered sharper escalations, with Luxurious Maisonettes rising by 16.35% from KES 84,000 to KES 97,730 per square meter. Standard Low-Rise Apartments experienced a 13.9% increase, from KES 60,435 to KES 68,837 per square meter, while Luxurious Apartment Blocks saw their construction costs climb by 15.53%, from KES 77,910 to KES 90,013 per square meter. These increases reflect higher material costs, labor adjustments, and the general inflationary environment within Kenya’s construction sector. The trend demonstrates that residential development costs continue to rise, even with relative stability in the exchange rate. This can be illustrated in the graph below

Figure 5.3: Cost of construction per square meter



Source: AAK, 2025

## 5.2. Land and Property Market

Kenya's land and property market in 2025 continued to demonstrate resilience despite macroeconomic headwinds, including sustained high interest rates, inflationary pressures, and political uncertainties. According to the Hass Consult Quarterly Land and Property Indices (2025), the sector recorded steady gains across key metropolitan nodes, driven by infrastructure upgrades and shifting buyer preferences toward affordable and strategically located parcels.

Table 5.1: 2025 Land and Property Indices

Land and Property Composite Indices	Growth or Decline		
	Q1	Q2	Q3
Land Sales (Nairobi Suburbs)	6.92%	6.67%	6.27%
Land Rentals (Nairobi Satellite Towns)	9.93%	8.86%	6.56%
Property Sales (Annual Change)	4.9%	7.8%	8.2%
Property Rentals (Annual Change)	-0.1%	-0.3%	-0.3%

Source: Hass Land and Property Indices, 2025

### Land Market Trends

- Average land prices in Nairobi and its metropolitan area surpassed KES 210 million per acre, marking a new historical high and reinforcing land's position as a robust asset class.
- Upper Hill retained its lead as the most expensive location, averaging KES 554 million per acre, followed by Westlands at KES 504 million, reflecting sustained demand for commercial nodes (Hass Land Index Q3).
- Satellite towns continued their upward trajectory, with Juja (14.9%), Kiserian (13.2%), Limuru (12.4%), and Ruiru (10.5%) demonstrating immense annual growth.
- Ruaka remained a standout performer, with land prices exceeding KES 111 million per acre, rivalling prime Nairobi suburbs and attracting mixed-use developments. Kiambu and Mlolongo also performed well with prices averaging KES 48 million and KES 46 million, respectively.
- Juja recorded the highest annual growth rate among Nairobi satellite towns, with land prices increasing by 14.9% year-on-year. Over the last decade, Juja's land prices have surged 3.65 times, indicating strong long-term appreciation and sustained demand. The trend reflects its attractiveness for real estate investment, likely driven by proximity to Nairobi, expanding infrastructure, and educational institutions in the area.

### Market Composition

Apartments continued to dominate Nairobi's property landscape, accounting for 63.5% of transactions, compared with semi-detached houses (28.7%) and detached houses (7.8%), reflecting affordability constraints and urban densification.

### Property Sales and Rental Market

- The Hass Composite Sales Index rose to 8.2% by Q3 2025.
- Suburbs such as Muthaiga (13.9%), Runda (15.3%), and Ridgeways (12.9%) recorded the highest annual increase in sales of houses, while Gigiri (8.7%) and Spring Valley (7.4%) reported high indices in rentals. However, Muthaiga's rental index dropped by (-8.1%) as a result of the mass exit of numerous multinational agencies from the area.
- In contrast, the indices for sale of apartments in suburbs demonstrated a downward trend with major drops being witnessed in Muthangari (-10.9%), Upper Hill (-11.3%), and Westlands (-13.2%). Although Parklands recorded a 12.5% growth in rental apartments, Muthangari and Westlands recorded negative growth at -4.8% and -4.6%, respectively.
- In satellite towns, Juja recorded the highest growth in sales at 12.8% while Kiambu had the highest index in rentals at 17.1%.
- Apartments in satellite towns experienced a lower growth rate, with Syokimau leading in both sales and rentals at 7.0% and 12.1%, respectively.
- On the other hand, high-density zones such as Westlands and Kilimani recorded marginal declines or flat growth, reflecting market saturation and buyer preference for lower-density neighbourhoods.

### 5.3. Alternative Financing Models for Construction in Kenya

Financing is a critical component of any construction project, influencing its viability, pace, and overall success. In Kenya, the construction industry is broadly divided into **public projects**, undertaken by the national government, county governments, and parastatals, and private projects, implemented by individual developers, cooperatives, or private companies. Each category relies on different financing mechanisms to mobilize the resources necessary for project delivery.

#### Financing Models for Public Construction Projects

Public projects draw funding from a combination of *public funds*, *Public-Private Partnerships (PPPs)*, *domestic capital mobilization*, and *external financing from development partners*.

##### a. Public Funds

Public funds remain the primary source of funding for government-led construction initiatives. They are sourced from Tax revenue, Government grants, and borrowings. These resources are allocated through national and county budgets to support infrastructure such as roads, hospitals, schools, and public housing.

##### b. Domestic Capital Mobilization

The government is tapping into local institutional capital, mainly pension funds and insurance companies. These institutions channel long-term savings into infrastructure investments, offering a sustainable source of domestic financing while reducing reliance on external borrowing.

##### c. Public-Private Partnerships (PPPs)

PPPs provide a structured mechanism for leveraging private sector capital, technology, and expertise. The *Public Private Partnerships Act, 2021*, establishes the legal framework governing long-term contracts for the design, financing, construction, operation, and maintenance of public infrastructure. PPPs are commonly used in sectors such as transport, energy, health, and housing. They help accelerate project delivery while sharing risk between the public and private sectors.

##### d. External Financing and Development Partners

Public entities also receive financing from various international institutions, categorized as: *Multilateral donors*, such as the World Bank Group (IDA, IFC, MIGA) and the African Development Bank (AfDB), *Bilateral donors*, which include agencies from individual countries offering loans, grants, or technical support. And *Export Credit Agencies (ECAs)*, which are government-supported institutions that provide guarantees, loans, and insurance to promote international trade and support companies investing in overseas projects. ECAs mitigate political and commercial risks, enabling governments and contractors to secure favorable project financing.

#### Financing Models for Private Construction Projects

Private sector construction in Kenya relies on a diverse range of financing structures. These include *equity financing*, *joint ventures*, *collective investment schemes*, and *institutional debt financing models*.

##### a. Equity Financing

This model involves a project owner raising capital by selling ownership stakes in the project to investors. It is suitable for developers seeking funding without taking on debt, though it requires surrendering a share of the project's ownership and profits.

##### b. Joint Venture (JV) Financing

In a joint venture, two or more parties contribute resources, such as capital, land, or technical expertise, to execute a construction project.

**Equity financing** suits developers seeking passive investors, whereas *Joint ventures* are ideal when partners want to share risks, pool complementary resources, or implement large-scale developments.

##### c. Collective Investment Schemes (CIS)

These schemes allow multiple investors to pool funds for investment in professionally managed portfolios. Examples include: Mutual funds, Unit trusts, and Collective investment funds (CIFs) managed by banks or trust companies. CIS models enable small and medium investors to participate in large construction projects with reduced individual risk.

##### d. Institutional Debt Financing

This involves borrowing from banks or other institutional lenders, with repayment required over a specified period and interest charged on the borrowed amount. Debt financing is widely used for housing and commercial developments. According to the *2023–2024 Kenya Housing Survey Basic Report*, key loan products used for housing development include: Purchase of rental properties at 18%, Graduated loans at 3.7%, Mortgage finance at 18%, Incremental construction financing at 22.9%, Construction financing for owner occupation at 48%, Construction financing for rental units at 42.3%, Construction financing for sale units at 21.1% and Land acquisition loans at 61.1%. These statistics highlight a strong dependence on debt financing in Kenya's private construction sector.



Table 5.2: Various forms of green financing and their disbursed amounts in 2025

Fund/Initiative	Amount Allocated/Disbursed	Purpose
Green Climate Fund	KES 36 million (2025 readiness project)	Supports mitigation/adaptation projects; implemented through local institutions such as KCB Bank. Includes projects like TWENDE.
Adaptation Fund	USD 10 million (KES 1.3 billion)	Implemented by NEMA to strengthen climate resilience and support vulnerable communities.
Global Environment Facility (GEF)	Not specified	Supports implementation of international environmental agreements through conservation and protection projects.
Climate Investment Fund (CIF)	SREP – USD 60 million (KES 7.8 billion) CTF – USD 30 million (KES 3.9 billion)	Supports clean technology and low-carbon energy investments.
COP30 Financial Resolutions	Global target: USD 1.3 trillion (KES 169 trillion) annually by 2035	Includes doubling adaptation finance by 2025 and tripling by 2035; launched the Global Implementation Accelerator and Belém Mission.

Kenya's construction industry draws from a wide spectrum of financing models tailored to the needs and capacities of public and private stakeholders. Understanding these financing mechanisms is crucial for developers, contractors, policymakers, and investors seeking to deliver sustainable, well-structured construction projects in the country.

The Kenyan shilling remained stable at

**USD 129**

throughout 2025, cushioning construction costs

Cement prices rose to

**KES 850 per 50kg**

bag in December 2025, up from KES 650 in December 2022

Land in Upper Hill, Nairobi, averages

**KES 554M**

per acre, making it the most expensive location in the country

# 06.

## Education and Workforce Growth

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### 6.1. 2025 Graduates from Bachelor's and Diploma Programmes

In November 2025, AAK undertook a comprehensive desk research exercise to determine the number of built environment professionals entering the workforce in 2025. The study focused on disciplines aligned with the 8 AAK Chapters, including architects, town planners, quantity surveyors, construction project managers, environmental design consultants, landscape architects, and engineers (built environment-related), as well as interior designers. Based on available data, an estimated 2,585 degree graduates and 2,014 diploma holders had completed their studies by November 2025.

It is important to note that these figures represent a partial count. Several universities and national polytechnics have graduations scheduled for

December 2025, which will increase the total number of graduates. In addition, numerous TVET institutions across the country offer diploma programmes in various fields of the built environment, whose graduates' data are not captured in this review. This survey focused solely on the 30 national polytechnics for diploma graduates, and some of these institutions had also not uploaded their graduation data on their official websites.

These findings highlight the importance of a coordinated, sector-wide system for tracking graduate output in the built environment, both for workforce planning and for supporting professional regulation.



Table 6.1: 2025 Graduates of Built Environment Degrees in Universities

Profession	Programme	UoN	JKUAT	KU	Maseno	TUJ	DekUT	Machakos	Murang'a	Total
Interior Design	B.A. Interior Design	38			83					121
Architecture	B. Architectural Studies	66	120	1		13				200
	B. Architecture	63	1			17				81
Environmental Design	M. Architecture Environmental Design	2								2
Town Planning	B.A. Planning	47								47
	B.Sc. Urban & Regional Planning			1						1
	B.A. Urban & Regional Planning, IT				36					23
	B. Built Environment (Urban Planning)					23				23
Construction Project Management	B. Construction Management	36	4	3						43
	B. Built Environment (Construction Management)					45				45
	B. Technology in Building Construction						51			51
Quantity Survey	B. Quantity Surveying	50	3			64				117
Engineering	B.Sc. Civil Engineering	141	106	44			95	80		466
	B. Engineering in Civil Engineering					55				55
	B. Technology in Civil Engineering					99				99
	B. Education Technology (Civil Engineering)						51			51
	B.Sc. in Electrical & Electronic Engineering	62	61	26			99	71	27	346
	B. Engineering in Electrical & Electronic Engineering					40				40
	B.Technology in Electrical Engineering					93			37	130
	B. Education Technology (Electrical Engineering)						50			50
	B. Technology in Mechanical Engineering Technology								38	38
	B.Sc. in Mechanical Engineering	56	48	30			84	46		264
	B. Engineering in Mechanical Engineering					36				36
	B. Technology in Mechanical Engineering Technology					75				75
	B. Education Technology (Mechanical Engineering)						46			46
Bachelor of Science in Mechatronic Engineering		43				94			137	
<b>Total</b>		<b>561</b>	<b>386</b>	<b>105</b>	<b>119</b>	<b>560</b>	<b>570</b>	<b>197</b>	<b>102</b>	<b>2587</b>

### Legend

B.: Bachelor of

Sc.: Science

Table 6.2: 2025 graduates of diploma &amp; higher diploma programmes in national polytechnics

Profession	Programme	TUK	DeKUT	Machakos	MKU	Murang'a	Kenya Coast NP	Ol'lessos NP	Kaiboi NP	Meru NP	Nyandarua NP	Sigalagala NP	Bungoma NP	Nairobi NP	Michuki NP	Total
Architecture	D. Architecture		12							8						20
	D. Technology (Civil Engineering)	35					36	35		256	71	109	34		65	641
Engineering	D. Civil Engineering			6												6
	D. Electrical & Electronics Engineering (Power)	19	20	1	16	3	70	63	17	166	40		101	93	14	623
	D. Electrical Engineering (Control & Instrumentation)								6						12	24
	Higher D. Electrical Engineering (Power)						9									9
	D. Mechanical Engineering			8			50	9	2		27	20	7		27	150
	D. Water Engineering								9							9
	D. Building Technology			7	26	17	41	105	40	64	38				34	372
	D. Technology (Building Construction)	2														2
	Higher D. Construction (Building & Civil)								10							10
	Quantity Survey	D. Quantity Surveying				35		34		53	26					
	<b>Total</b>	<b>56</b>	<b>135</b>	<b>520</b>	<b>176</b>	<b>129</b>	<b>148</b>	<b>135</b>	<b>148</b>	<b>520</b>	<b>176</b>	<b>129</b>	<b>148</b>	<b>93</b>	<b>152</b>	<b>2014</b>

### Legend

D.: Diploma in



An estimated **2,585 degree graduates** and **2,014 diploma holders** entered the built environment workforce in 2025

## Key Issues Emerging from Bachelor's and Diploma Programmes in the Built Environment

Several important built environment programmes remain unregulated despite the annual output of graduates. These include Construction Project Management, Landscape Architecture, Environmental Design Consultancy, and Interior Design. Graduates from these programmes enter the workforce without a clear registration pathway, leaving employers without competency benchmarks and reducing professional accountability. The absence of regulation also limits the professionalization of emerging sectors in Kenya.

Additionally, while diploma holders, including technicians and licentiates, play a vital role in the built environment industry, they remain unregulated. This lack of formal recognition causes several challenges, such as limited career advancement, unclear professional paths, and inconsistent competency standards across the workforce. It also diminishes their visibility in workforce planning and professional representation, making it harder for the sector to fully utilize their skills in project execution, quality control, and supervision.

The bachelor's programmes in Kenya's built environment sector exhibit significant fragmentation, with multiple titles used across different universities. For instance, in town planning disciplines, the existing titles include Bachelor of Arts (Planning), Bachelor of Urban and Regional Planning, Bachelor of Urban Planning, and Bachelor of Arts in Spatial Planning, some of which are not consistently recognized by the Physical Planners Registration Board (PPRB), such as B.A. Spatial Planning, offered by Jaramogi Oginga Odinga University of Science and Technology. This lack of harmonization creates confusion for graduates, employers, and regulators, complicates professional registration, and leads to uneven training standards across the country. There is also a noticeable overlap and duplication of programmes across universities, often involving minor rebranding, such as "Construction Management" versus "Construction Engineering Management."

The alignment between graduate output and industry demand is significantly uneven. Built environment courses produce more graduates than the sector can absorb, as the July 2025 AAK survey found that 90% of the 1,709 graduates and diploma holders sampled were unemployed. This is despite the fact that these skilled professionals are urgently needed, as the uptake of professional services in construction projects in Kenya remains low at 20%.

Coordination between universities and professional regulatory bodies, including BORAQS, PPRB, and EBK, remains weak. This disconnect contributes to non-accredited programmes, graduates who cannot register professionally, and low transition rates from university to the workforce. This limits career progression, hinders international mobility, and affects the overall quality of the built environment due to a lack of standardized competencies and professional oversight.



## 6.2. Employment Status for Graduates and Technicians in the Built Environment

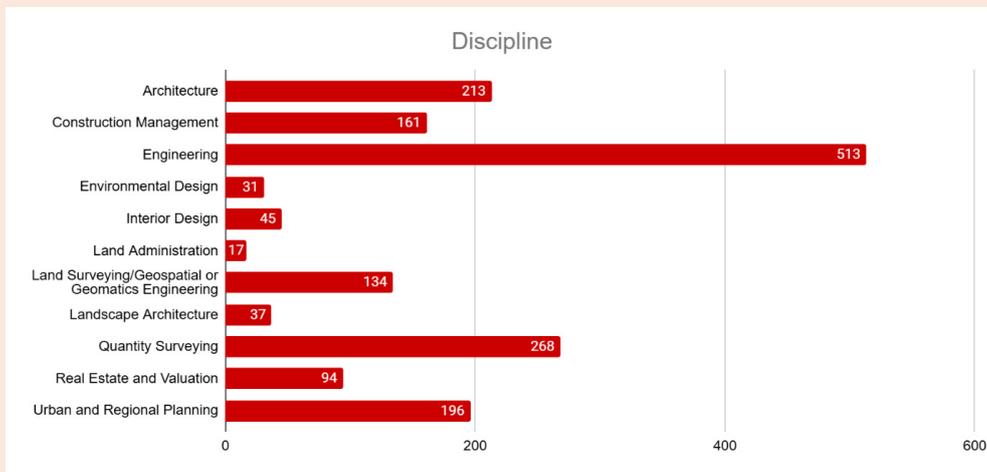
In July 2025, the Affordable Housing Forum, comprising the AAK, the Institution of Engineers of Kenya (IEK), and the Institute of Quantity Surveyors of Kenya (IQSK), commissioned a survey targeting graduates and technicians to assess the employment status of their members.

The exercise followed a request from the State Department for Housing and Urban Development to inform the development of a targeted work stream.

The survey was also to inform the launch of an onboarding programme for 4,000 graduates and technicians.

The survey received 1,709 responses, of which 718 (42%) were technicians and 991 (58%) were graduates. The majority of respondents (513) were from the engineering profession, followed by quantity surveying (268) and architecture (213), as illustrated in the graph below.

Figure 6.1: Area of specialization



Source: AAK, 2025

Alarmingly, **only 163 (10%) out of 1,709 respondents were employed**, while **1,546 (90%)** reported being unemployed. Additionally, 43.6% of the respondents had graduated less than 2 years ago, 31.4% had graduated between 2-5 years ago, and 25% graduated more than 5 years ago

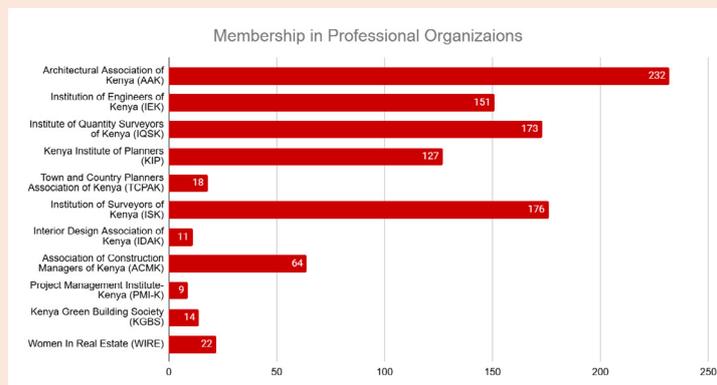
This underscores the high unemployment rate among graduates and technicians in the built environment sector and highlights the urgent need for targeted interventions to enhance job creation, mentorship, and absorption within the industry.

The survey further revealed that 54% of respondents were members of professional organizations, including the Architectural Association of Kenya (232), the Institution of Surveyors of Kenya (176), the Institute of Quantity Surveyors of Kenya (173), and the Institution of Engineers of Kenya (151). The remaining 823 respondents indicated they were not affiliated with any professional association, highlighting a significant gap in professional engagement among graduates and technicians in the built environment sector.



A July 2025 survey found **90% of graduates and technicians in the built environment were unemployed**

Figure 6.2: Membership in professional associations



Source: AAK, 2025

The majority of participants were based in Nairobi County, accounting for 485 respondents. Other counties with notable representation included Kiambu (130), Nakuru (76), Kericho (52), and Uasin Gishu (48). Counties such as Siaya (43), Kisumu (44),

Machakos (38), and Murang'a (37) also recorded a fair number of respondents. Conversely, some counties, including Mandera, Garissa, and Isiolo, had minimal participation, each registering fewer than five respondents.

Table 6.3: County of residence

County	Number
Baringo	25
Bomet	36
Bungoma	30
Busia	11
Elgeyo Marakwet	21
Embu	18
Garissa	1
Homa Bay	36
Isiolo	2
Kajiado	44
Kakamega	28
Kenya	76
Kericho	52
Kiambu	130
Kilifi	8
Kirinyaga	25
Kisii	27
Kisumu	44
Kitui	29
Kwale	4
Laikipia	14
Lamu	2
Machakos	38
Makueni	21

County	Number
Mandera	1
Marsabit	3
Meru	29
Migori	27
Mombasa	27
Murang'a	37
Nairobi	485
Nakuru	76
Nandi	19
Narok	32
Nyamira	15
Nyandarua	15
Nyeri	16
Samburu	4
Siaya	43
Taita Taveta	7
Tana River	9
Tharaka Nithi	17
Trans Nzoia	20
Turkana	11
Uasin Gishu	48
Vihiga	7
Wajir	2
West Pokot	14

AAK emphasized that while the State Department’s plan to employ 4,000 graduates and technicians under the Affordable Housing Programme was commendable, it must align with the legal requirements for professional training stipulated in the Architects and Quantity Surveyors Act, the Engineers Act, the Physical Planners Registration Act, and related statutes. These laws require graduates to complete supervised practical experience before being fully registered. To ensure

proper mentorship, professional growth, and quality assurance, AAK recommended that the State Department concurrently engage experienced, registered professionals at a mentor-to-mentee ratio of 1:5, totaling at least 800 professionals across all disciplines. This structured approach would uphold professional standards, safeguard public interest, and transform the initiative into a meaningful pathway toward licensure.

### **6.3. Strategic Forum of the Education, Research, and Innovation Committee of the AAK College of Fellows and The Heads of Schools of Built Environment in Kenya**



*The Joint Committee on Research, Education and Innovation, during a courtesy call to BORAQS*



*Strategic Forum on Research, Education, and Innovation Meetings on February 19 & May 7*

The Education, Research, and Innovation Committee of the AAK College of Fellows established a strategic Forum bringing together the Committee and the Heads of Schools of Built Environment across Kenya. The Forum aims to strengthen collaboration between academia, industry, and regulators within the Built Environment sector. Its overarching purpose is to harmonize curricula, enhance mentorship, promote research and innovation, and streamline accreditation processes to produce globally competitive graduates

and elevate professional standards. The Forum brings together:

1. 26 universities and TVETs offering Built Environment programs.
2. 3 regulators: Physical Planners Registration Board (PPRB), Board of Registration of Architects and Quantity Surveyors (BORAQS), Engineers Board of Kenya (EBK).
3. Government agencies: Ministry of Education and Commission for University Education (CUE).

### Key Strategic Objectives

1. **Curriculum Harmonization & Accreditation:** Align programs across institutions to eliminate duplication and meet global standards (e.g., EBK's Washington Accord compliance). Accelerate validation and accreditation processes through joint engagement with regulators.
2. **Mentorship & Student Transition:** Institutionalize mentorship programs and expand outreach beyond Nairobi and strengthen internship and job placement systems via the AAK Job Portal.
3. **Research, Innovation & Competitions:** Promote design charrettes, student competitions, and collaborative research projects, and support funding for student research and exhibitions.
4. **Industry Integration & Global Exposure:** Facilitate exchange programs, joint master's degrees, and international collaborations, and encourage practitioner involvement in teaching and curriculum delivery.
5. **Advocacy & Policy Engagement:** Engage MoE and CUE on Built Environment pathways in CBE

### Progress Made in 2025

1. Two high-level forums convened, bringing together AAK Fellows, Heads of Built Environment Departments, and regulators.
2. Joint Committee formed to coordinate actions, with the University of Nairobi designated as the 2025 convener. This will be a rotational role held by all the institutions.
3. Formation of the strategic forum on architecture and quantity survey education in Kenya, working sub-committee (BORAQS, Universities, AAK College of Fellows)
4. Development and circulation of a technical paper on Strengthening Built Environment Education and Practice in Kenya.

# 07.

## Infrastructure Development

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### 7.1. Ministry of Roads and Transport

The Ministry is divided into two State Departments: the State Department for Roads, which oversees road infrastructure, and the State Department for Transport, which oversees transport operations, policy, and regulation. It hosts several agencies and institutions tasked with different aspects of roads and transport, including road management authorities for national, urban, and rural roads, standard-setting bodies, and training and materials-testing institutes. Earlier in the year, the Ministry published updated manuals, replacing the first-generation guides that had been in use for over 35 years:

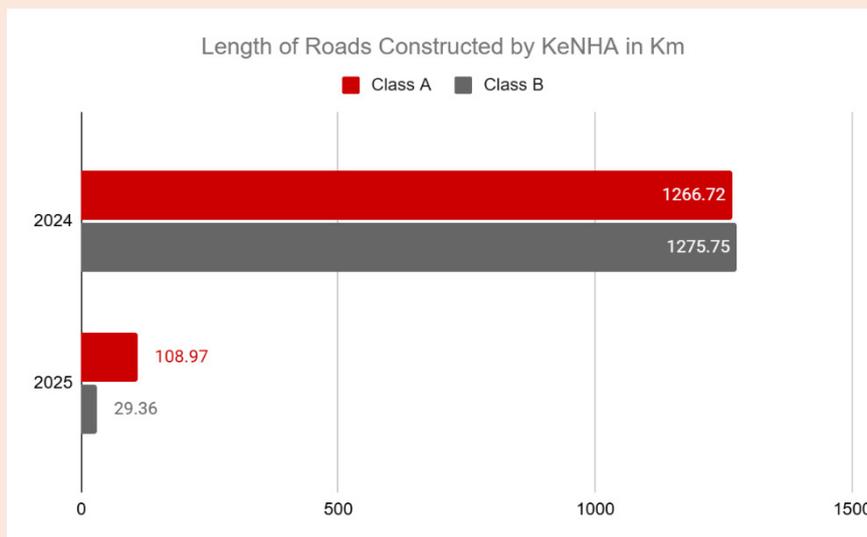
- i. **Road Design Manual Part 1 – Geometric Design:** Updates and reflects the newest standards for geometric design of roads.
- ii. **Road Design Manual Part 2:** Drainage Design/ Standard Drainage Structures Manual (Parts 1 & 2)
- iii. **Road Design Manual Part 3:** Materials and Pavement Design for New Roads (including LVSR guidance references)
- iv. **Road Design Manual Part 4:** Pavement Rehabilitation & Overlay Design
- v. **Road Design Manual Part 5 (Traffic Control):** Includes road signs, markings, traffic signals, and communications.
- vi. **Road Design Manual Vol 4 Part 2 – Retaining Structures Design:** Design for retaining structures and bridge abutments.
- vii. **Standard Specifications for Road & Bridge Construction (updated Standard Specifications)**
- viii. **Street Design Manuals for Urban Areas in Kenya**



## 7.2. Kenya National Highways Authority (KeNHA)

Between January to October 2025, the Kenya National Highways Authority (KeNHA) completed 138 km of roads, marking a sharp decline compared to the 2,542 km constructed during the previous year.

Figure 7.1: Length of roads constructed by KeNHA



Source: Kenya National Highways Authority, 2025



Of the roads constructed, Class A accounted for 79%, while Class B represented 21%. No Class S roads were developed during this period. Additionally, the Authority maintained 11,094 km of Class A, B, and S roads, representing an 86% increase from 5,960 km in 2024.

Road	Length maintained (Km)
Class A	4,967
Class B	5,761
Class S	365

Source: Kenya National Highways Authority, 2025

Furthermore, the average cost of road construction was **KES 112,744,462 per Km**, while the average maintenance cost was **KES 4,609,325 per Km**. Overall, 61.3% of road projects were completed during this period.



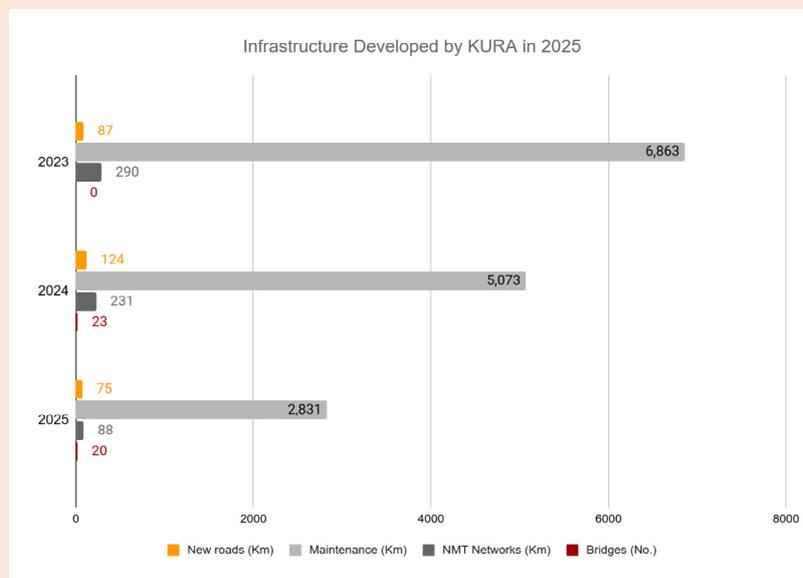
### 7.3. Kenya Urban Roads Authority (KURA)

The Kenya Urban Roads Authority (KURA) is mandated to develop, rehabilitate, maintain, and manage urban road networks in Kenya. Between January and October 2025, KURA constructed 75 km of new roads, representing a 40% reduction compared to the same period in 2024. These roads were classified under Development, Road Maintenance Levy Fund (RMLF), and Low Volume categories. The RMLF, established to provide a secure and sustainable

source of financing, remains a key revenue stream for KURA's road maintenance activities.

During this period, KURA maintained 2,831 km of roads, representing a 44% decrease from the previous year. Additionally, the Authority developed 88 km of non-motorized transport networks (walkways), down from 231 km in 2024, and constructed 20 bridges, down from 23 in the previous year.

Figure 7.2: Road infrastructure developed by KURA between 2023 to 2025



Source: Kenya Urban Roads Authority, 2025

KURA incurred an average cost of **KES 70 million per km** for road construction. Maintenance costs varied across projects, depending on factors such as the scope of work and the condition of existing roads. The Authority also reported a road completion rate of 62.4%.



KeNHA completed **138 km** of roads, a sharp decline compared to the **2,542 km** constructed in 2024.



KURA completed **75 km of roads**, representing a **40% reduction** compared to 2024

## 7.4. Kenya Roads Board (KRB)

The Kenya Roads Board (KRB) was established to oversee, coordinate, and finance the development, maintenance, and rehabilitation of road networks. The Board comprises individual and corporate stakeholders from both the public and private sectors, who actively participate in the management of roads and ensure the efficient use of the Road Maintenance Levy Fund (RMLF). In FY 2024/25, KRB allocated KES 3.7 billion for the maintenance of county roads.

Table 7.1: Funds allocated to counties by KRB

County	Allocation (KES)	County	Allocation (KES)
Mombasa	45,601,067	Kakamega	81,318,878
Kwale	71,758,747	Embu	73,706,112
Kilifi	85,820,621	Kitui	152,421,270
Tana River	69,459,630	Machakos	111,125,100
Lamu	47,403,262	Makueni	146,891,738
Taita Taveta	78,389,752	Nyandarua	78,019,732
Garissa	63,863,645	Nyeri	100,348,699
Wajir	90,533,914	Kirinyaga	67,262,744
Mandera	66,010,855	Murang'a	94,718,150
Isiolo	64,255,720	Kiambu	118,951,472
Meru	102,835,642	Turkana	88,140,833
Tharaka Nithi	55,944,250	West Pokot	57,829,022
Samburu	60,855,995	Vihiga	37,535,760
Trans-Nzoia	52,848,312	Bungoma	63,910,688
Uasin Gishu	86,288,947	Busia	45,520,243
Elgeyo Marakwet	52,755,391	Siaya	57,316,842
Nandi	65,154,809	Kisumu	68,301,577
Baringo	71,309,826	Homa Bay	61,056,106
Laikipia	80,806,317	Migori	56,919,675
Nakuru	183,432,688	Kisii	60,713,540
Narok	97,352,834	Nyamira	41,412,736
Kajiado	106,350,427	Nairobi	120,057,803
Kericho	59,568,948	<b>TOTAL</b>	<b>3,682,774,150</b>
Bomet	57,185,813		

Source: Kenya Roads Board, 2025

## Specific Projects

### Nairobi-Mombasa Expressway (Usahihi Express)

This project covers the construction of a 419 km, four-lane expressway as a greenfield development. Initiated as a Privately Initiated Proposal (PIP), it is estimated to cost KES 468 billion and is contracted through KeNHA, with Everstrong Capital as the project proponent. The project received initial approval in December 2023; however, in July 2025, the Project Development Report was found not to meet the criteria outlined in Section 43(11) of the PPP Act, 2021. The reviewing Committee remains open to a resubmission for a fresh assessment of the proposal.



### Nairobi-Nakuru-Mau Summit & Nairobi-Maai Mahiu-Naivasha Highways

The project is divided into two sections: the A8 Section, stretching from the Rironi Interchange to the Mau Summit turnoff (174.9 km), and the A8 South Section, running from the Rironi Interchange to the Naivasha Interchange via Maai Mahiu (56.38 km). It involves two proponents: a consortium comprising China Road and Bridge Corporation, Kenya (CRBC), and the National Social Security Fund (NSSF), and Shangdong Hi Speed Road and Bridge International Engineering Co., Ltd, whose PIPs were approved in July 2025. The project was officially launched on 28<sup>th</sup> November 2025; however, the Motorists Association of Kenya filed a petition on the same day, challenging the highway's concession and tolling, with a hearing scheduled for 5<sup>th</sup> December 2025.



### Standard Gauge Railway (SGR) Extension

A planned extension of the existing Standard Gauge Railway (SGR) from Naivasha to Malaba, via Kisumu, is scheduled to commence in January 2026. This 475 km extension aims to link Kenya to other East African Community countries, including Uganda, Rwanda, South Sudan, and the Democratic Republic of Congo, at an estimated cost of KES 645-648 billion.



The Nairobi–Mombasa Expressway is estimated to cost **KES 468 billion**, but was suspended in 2025 over feasibility concerns

## 7.5. Social Infrastructure Projects

### Talanta Stadium

Talanta Stadium is a flagship sports facility under the Talanta Sports City project, designed to meet international standards for football and athletics. The stadium has a carrying capacity of 60,000 spectators, and construction began in April 2024. On November 14, 2025, Sports CS Salim Mvurya announced that the project was 66% complete and is expected to be finalized by December 2025, in readiness for hosting the CAF Africa Cup of Nations in 2027.



*AAK members on build tour to Talanta Stadium in August 2025*

The China Road and Bridge Corporation was awarded the contract for this project, which is funded through a public-private partnership (PPP) model, with an estimated cost of US\$250 million.

### Electrification Drive in Kericho and Elgeyo Marakwet

The national government has launched the Borborwet and Cheptigit Village Electrification Projects in Belgut Constituency, Kericho County, under the Last Mile Connectivity Programme. Valued at KES 1.4 billion, the initiative targets 14,600 households across Kericho, including 2,246 in Belgut. Specifically, Borborwet Village will receive 128 new connections, while Cheptigit will receive 95, significantly boosting rural energy access.

Additionally, the Government has set aside KES780 million to connect over 9,000 homes to electricity in Elgeyo Marakwet County in the current financial year. According to the Deputy President Prof. Kithure Kindiki, the project has already been approved, and its implementation is underway.

### Solar-Powered Boreholes in Taita-Taveta County

In November 2025, the Coast Development Authority (CDA) launched two solar-powered boreholes, valued at KES 20 million, in Machungwani and Wololo, Challa Ward, Taita-Taveta County. Scheduled for completion in two months, the boreholes will connect to a metered water grid and include a water kiosk for affordable access. The initiative aims to provide clean water to 2,500 residents (1,500 in Machungwani and 1,000 in Wololo), reducing reliance on seasonal rivers and mitigating waterborne diseases.



*Solar-Powered Boreholes in Taita Taveta. Source: CDA*

### Kiambu Solar-Powered Streetlight Project

Kiambu County's KES 1 billion solar-powered streetlight project, launched in 2023, has now completed Phase Two, marking a major milestone in its renewable energy program. The initiative aims to cut electricity costs, enhance security, and extend business hours across all 12 sub-counties. To fast-track implementation, the county unveiled a 23-metre manlift, one of Kenya's largest, enabling

crews to install up to 40 streetlights per day, halving installation time. Once complete, the project will illuminate over 80% of Kiambu's public roads, making it one of the most well-lit counties. Funded through the county development budget, with support from local manufacturers and projected energy savings, the program has drawn praise for its impact on safety and economic growth. However, civil society groups have urged transparency on the KES 1 billion cost and accountability for delayed installations.



Once complete, the project will illuminate over **80%** of Kiambu's public roads, making it one of the most well-lit counties

### Kiambu County New ECDE Centers

Kiambu County has completed 312 modern Early Childhood Development Education (ECDE) centres in two years, with 178 more scheduled for completion by December 2025. By April 2026, all 524 ECDE centres will meet uniform standards. Each facility includes PP1 and PP2 classrooms, administrative offices, play areas, and separate sanitation for teachers and learners. The county's school feeding program now serves 40,000 children daily, providing fortified porridge, three boiled eggs weekly, and milk every Thursday. Additionally, free learning materials were distributed in January 2025 to make nursery education completely free. Governor Kimani Wamatangi increased the county bursary fund from KES 100 million to KES 500 million, raising allocations per beneficiary from KES 1,000 to a minimum of KES 5,000. These investments aim to ensure equitable access to quality early education across Kiambu.



*Kiambu County New Umoja Model ECDE Center. Source: Kiambu County Government*

## 7.6. Embedding Urban Planning in Kenya's Road Infrastructure Agenda

As Kenya races to expand its transport infrastructure, we must pause to ask a critical question: are our roads serving cities, people, and ecosystems, or merely cars? The impressive structures of concrete and steel rising across the country are a testament to ambition, but they also reveal a persistent silence in our approach, a silence of planning. The Nairobi Expressway was not a planning failure; it was a planning omission. It delivered speed, but it failed to speak the language of the city beneath it.

When the 27-kilometre elevated Nairobi Expressway opened, it was hailed as a symbol of progress, a

public-private partnership designed to decongest Nairobi and link Mlolongo to Westlands. Yet the facts now tell a more complicated story. Despite recording an average of over 67,000 vehicles daily, the project posted a net loss of KES 1.84 billion in the six months to December 2024, according to the National Treasury. Below its gleaming deck, pedestrians and cyclists still struggle for safe passage; *matatus* jostle in stagnant traffic; and shaded underpasses remain underused or unsafe. The expressway fulfilled an engineering dream but muted the human and ecological voices that define a city.

## The Next Wave: Kenya's Expanding Road Ambition

Yet this is not a Nairobi story alone. The next generation of mega-roads is already on the drawing board.

The Usahihi Expressway (Nairobi - Mombasa), a 440-kilometre toll highway conceived as a high-speed link between the capital city and the coastal city, was suspended in August 2025 after the Kenya National Highways Authority (KeNHA) and the Public-Private Partnerships Committee found its feasibility model wanting. Its halting was

not merely administrative; it was a timely reminder that financial viability alone does not equate to spatial, social, or environmental sustainability.

Meanwhile, projects such as the Nakuru-Mau Summit Highway, the Eastern, Western and Northern Bypasses, the LAPSSET Corridor, and the Dongo Kundu and Mombasa Bypasses represent the next frontier of Kenya's transport investment- and the next test of whether planning can keep pace with construction.

## Corridors of Opportunity, or Ribbons of Sprawl?

As Kenya rolls out its next wave of major roads, it will be vital to recognise that these corridors aren't simply paths for vehicles; they will also become linear zones of settlement, commerce, and land-use change. For example, along the proposed Usahihi Expressway (Nairobi-Mombasa) corridor, countless service stations, truck parks, housing estates, and commercial strips are likely to spring up in the "ribbon" of land adjacent to the route. Without careful planning and land-use control, those ribbons may devolve into an unstructured sprawl of low-density development, informal roadside settlements, loss of agricultural land, severed ecological patches, and degraded community amenities.

Conversely, with professional physical planning and urban design embedded in the process, those corridors can be shaped into economic development zones rather than accidental by-products of traffic engineering. Along the LAPSSET Corridor, for instance, it is already anticipated that the highways will be more than mobility infrastructure; they will trigger towns, logistics hubs, tourism nodes, and energy infrastructure. The policy documentation recognizes the need to upgrade secondary and feeder roads, anticipating more than 30,000 km of corridors in East Africa over the next decades.

In the case of the Dongo Kundu Bypass and other coastal bypasses, the bypass itself may reduce traffic but also open up the hinterland for new commercial and residential development, often outward from Mombasa's edge. Without planners guiding access control, setbacks, land-use zoning, environmental buffers, and pedestrian/active-mobility linkages, this ribbon can become a strip-mall effect of linear shopping, ad-hoc housing, weak transit connections, and a negative impact on the coastal ecosystem.

Similarly, the Nakuru-Mau Summit Highway, now approved for expansion to a four-lane dual carriageway, promises to connect the Rift Valley to Nairobi more efficiently, but without careful planning of interchanges, service centres, and land-use around it, it could replicate the very urban sprawl and congestion it seeks to cure. Nairobi's Eastern, Western and Northern Bypasses, some already undergoing dualling and extensions, face a similar risk. Designed to divert traffic, they increasingly attract unplanned ribbon development and unsafe pedestrian environments when local physical and land-use development plans and access controls lag behind.

At the coast, the nearly complete Dongo Kundu Bypass, a KES 45 billion investment linking Miritini to Ng'ombeni, has been celebrated for transforming Mombasa's connectivity and port access. Yet, as planners know, the real test lies ahead, whether this bypass catalyses inclusive, well-zoned growth or simply shifts congestion to new frontiers. Further inland, the LAPSSET Corridor, the grand vision linking Lamu Port to South Sudan and Ethiopia, continues to open vast new territories. In October 2025, the National Land Commission announced the acquisition of 960 hectares of community land for road segments in Garissa County. The scale of such projects demands spatial foresight to prevent environmental degradation and displacement. Even the celebrated Mau Mau Road, which stitches together central Kenya's counties, illustrates how infrastructure can either reinforce equitable regional development or trigger unregulated roadside settlements when planning controls are weak.

## The Missing Link

Across these examples, one truth stands out: Kenya is building faster than it is planning.

Under the Physical and Land Use Planning Act, 2019, infrastructure must integrate with land-use frameworks, support liveable communities, and promote sustainable mobility. Yet planning voices remain peripheral in agencies such as KeNHA, KURA, and KeRRA, where project evaluation still relies on traffic projections rather than on urban integration. The result is a mismatch between technical success and spatial failure, roads that move cars but not communities.

What good planning offers in these ribbons is the ability to convert a mobility spill-zone into a structured urban corridor. It allows the integration of mixed-use interchanges, safe pedestrian crossings, designated service clusters, non-motorised mobility, ecological conservation strips, and genuine public realm amenity along the road. The difference is significant:

a road corridor becomes a catalyst for compact, connected, equitable urban growth rather than just a conduit for cars.

If we are to correct this trajectory, Kenya must embed physical planners, urban designers, and environmental experts into the very DNA of road development. Every new corridor, whether the Mombasa Bypasses, the Nakuru–Mau Summit expansion, or the LAPSET link roads, should begin with a spatial strategy: how it connects with existing towns, what kind of economic clusters it stimulates, how it protects green corridors and watercourses, and how it ensures safe and dignified mobility for all users. Roads should be conceived not as linear conduits but as urban systems, catalysts of form, social life, and economic balance.

The roads that forget the city are those that forget their purpose: to serve people. Kenya’s infrastructure future must reclaim that purpose. It is time to build roads that speak fluently in the languages of cities, citizens, and ecosystems, not just the dialect of cars.

## 7.7. Perceptions of Safety in Public Spaces: A Gendered Lens

### A Study by the Women in Real Estate (WIRE) Kenya

Public spaces are central to urban life as they offer spaces for people to interact, build communities, rest and rejuvenate, and participate in their communities. However, safety, both real and perceived, influences how the spaces are used. In particular, it influences who feels welcome and benefits from the spaces. In August 2025, Women in Real Estate commissioned a study on “The Influence of Public Space Design on Gendered Use and Social Interaction” to explore this phenomenon. Four spaces were selected to capture variation across formal and informal contexts: Jeevanjee Gardens, Aga Khan Walk, Gacio Market, and Ruaka Roundabout. A total of 238 respondents, including 78 women and 160 men, were interviewed.

The findings revealed glaring differences in safety perceptions between men and women in public spaces and how these are linked to the design of those spaces.

### Understanding Safety as a Gendered Experience

More often than not, safety is viewed through the lens of crime statistics. However, this overlooks subtle safety concerns that may not constitute a crime. For instance, while unwelcome stares may make women feel unsafe, the same may not apply to men. In addition, whereas men may interpret a poorly lit pathway as merely inconvenient, women often see the same setting as threatening. Thus, safety in public spaces encompasses not just physical security but also psychological security.

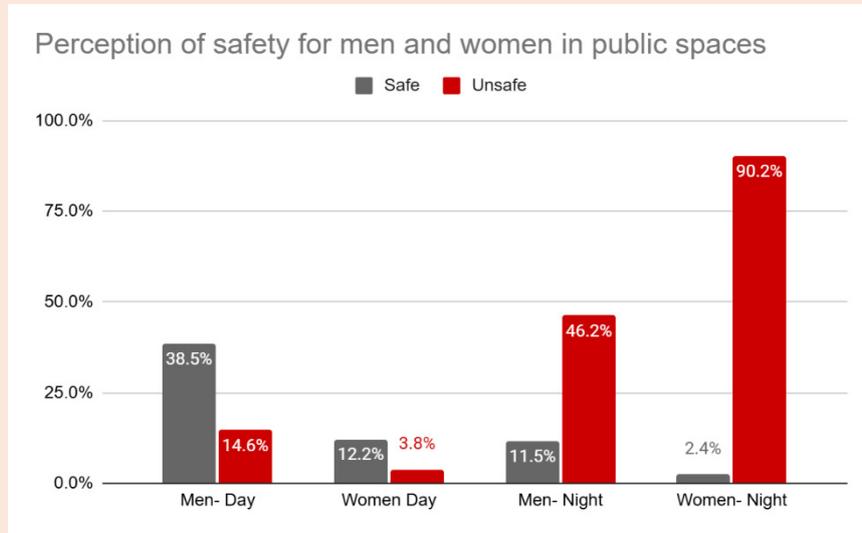


During the day, **38.5% of men** reported feeling very safe in public spaces, compared to only **12.2% of women**



At night, **90.2% of women** reported feeling unsafe at night compared to **46.2% of men**

Figure 7.3: Perception of safety in public spaces during the day and at night



Source: *Women in Real Estate, 2025*

Study findings support this, revealing that more men than women reported feeling safe in public spaces both during the day and at night. During the day, 38.5% of men reported feeling very safe in public spaces, compared to only 12.2% of women. A majority of both genders reported feeling moderately safe. However, 14.6% of women reported feeling unsafe during the day, compared with 3.8% of men.

At night, perceptions of safety declined for both genders, although men consistently reported feeling safer than women. Only 11.5% of men felt very safe at night, while a mere 2.4% of women reported the same. Notably, 90.2% of women reported feeling

unsafe at night compared to 46.2% of men.

These findings highlight significant gender disparities in safety perceptions, particularly at night, which can greatly influence the way men and women use public spaces. Women's heightened sense of insecurity, especially at night, may limit their mobility, restrict access to social and economic opportunities, and reinforce gender inequality in urban life. Conversely, men's relatively higher sense of safety allows them greater freedom of movement, illustrating how public spaces can unintentionally become exclusionary for women without targeted interventions.



## Design Attributes That Influence Perceptions of Safety

The study identified several design features that directly correlate with women's perceived safety in urban spaces. These include:

- 1. Lighting:** Poor lighting is one of the most critical contributors to feelings of insecurity. Well-lit pathways and transit points make it easier for women to navigate spaces, improve visibility, and reduce opportunities for harassment.
- 2. Sightlines:** Clear, unobstructed sightlines allow women to see and be seen. Spaces with blind corners, dense vegetation, or obstructive structures create uncertainty and elevate perceptions of danger. Even sightlines are thus a key factor in enhancing women's comfort and safety in public areas.
- 3. Seating Layout and Spatial Arrangement:** Clustered seating under shade or near areas of activity supports social interaction and enables women to occupy space confidently. Conversely, isolated or poorly arranged seating often deters women, especially during off-peak hours.
- 4. Activity Nodes:** Areas with diverse, continuous activities such as kiosks, play areas, cafes, or communal spaces contribute to perceptions of safety. This is because the presence of other people enhances natural surveillance and reduces the likelihood of harassment.
- 5. Maintenance and Aesthetic Quality:** Neglected spaces with broken infrastructure, litter, or vandalism signal abandonment and heighten anxiety for women and other vulnerable groups. Well-maintained spaces, on the other hand, reflect care and enhance perceptions of safety.

## Patterns of Public Space Use Linked to Safety

This study revealed that how women use public spaces is significantly influenced by their perceptions of safety. Where urban design fails to support visibility, accessibility, and comfort, women limit their use of public spaces to daytime hours, to areas where social activity is concentrated, and, for instance, to places where they are accompanied by others.

Men, on the other hand, often report fewer constraints linked to design or security conditions, which can increase their usage of public spaces.

## Why Safety Perceptions Matter

Perceptions of safety have tangible consequences:

- 1. Limited Access and Participation:** If women avoid certain streets, parks, or public buildings due to safety concerns, they effectively lose access to civic, economic, and recreational opportunities.
- 2. Reduced Social Interaction:** Safety concerns not only restrict movement but also diminish women's likelihood to engage socially, reducing their visibility and representation in public life.

## Inequitable Urban Development

Spaces that women cannot comfortably use perpetuate exclusion and reinforce societal inequities. The study emphasized that improving women's perceptions of safety is essential to realizing inclusive and vibrant public spaces.

## Gender-Responsive Design as a Solution

- The study concluded that gender-responsive design strategies are crucial for encouraging more women to participate in urban life. They include;
- Prioritizing safety through the integration of lighting
- Incorporation of continuous, shaded seating that supports diverse users.
- Creating public spaces that encourage and attract diverse activities to encourage constant use and

Including communities and especially women in the design process to ensure that the design responds to their needs.

Such strategies not only enhance safety but also promote equity and a sense of belonging in urban spaces.

## Conclusion

Perceptions of safety in public spaces fundamentally shape how different genders interact with urban environments. The WIRE study affirmed that design, visibility, maintenance, and activity levels are deeply intertwined with safety perceptions, and that women disproportionately bear the burden of poor design choices.

By embedding gender-responsive principles into planning and design processes, built environment professionals can create public spaces where everyone can participate freely, confidently, and safely.

# 08.

## Regulatory Framework

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The regulatory framework governing Kenya’s Built and Natural Environment has undergone a significant reformation, moving decisively from high-level constitutional mandates toward operationalizing detailed, transparent, and sustainable practices. This trend is characterized by the push for sustainable planning, devolving decision-making authority, mandating robust public participation mechanisms, and rigorously integrating climate change mitigation and resilience into core planning and financial laws.

### 8.1. Physical and Land Use Planning Handbook 2025

Overall, this activity signals a systemic attempt to restore planning coherence, enhance professional accountability, and adopt digital-first strategies to improve efficiency and curb corruption in development control and investment facilitation. Here’s a summary of laws reviewed in 2025.

September 2025 marked a transformative moment with the release of the [Physical and Land Use Planning Handbook 2025](#), which replaced the outdated 2008 Physical Planning Handbook. The updated handbook represents a fundamental paradigm shift, aligning explicitly with the *Constitution of Kenya 2010* (Article 66(1)) and PLUPA No. 13 of 2019, replacing the colonial-era *Physical Planning Act (Cap 286)* foundation of its predecessor. Key improvements include comprehensive standards for disaster risk management, blue economy development, smart

cities, and significantly expanded water resource protections (oceans now require 300m buffers up from 30m, lakes 100-200m buffers, and rivers 30m buffers).

The handbook introduces modern infrastructure standards, including mass rapid transit systems, electric vehicle charging stations (minimum 0.25ha), and detailed requirements for non-motorized transport. Housing density standards have been updated to promote mixed-use development and reduce social segregation, with low-density coverage reduced from 50% to 30% maximum plot coverage. Perhaps most significantly, all physical development plans must now be GIS-based with standardized mapping protocols, replacing the basic graphical presentation requirements of 2008.



The Physical and Land Use Planning Handbook 2025, which replaced the outdated 2008 Physical Planning Handbook

Table 8.1: Comparison between the Physical Planning Handbook 2008 and the Physical and Land Use Planning Handbook 2025

FEATURE	PHYSICAL PLANNING HANDBOOK, 2008	PHYSICAL AND LAND USE PLANNING HANDBOOK 2025
<b>Primary Legal Foundation</b>	Anchored primarily on the Physical Planning Act (Cap 286) and references older statutes like the Local Government Act (Cap 265), Survey Act (Cap 299), and Public Roads and Roads of Access Act (Cap 399).	Aligned explicitly with the Constitution of Kenya 2010 (Article 66(1)) and the Physical and Land Use Planning Act (PLUPA) No. 13 of 2019.
<b>Justification for Review</b>	Intended to nationalize existing rules, regulations, and standards across various statutes. Prepared due to the lack of gazetted standards, leading to haphazard, uncoordinated development.	Required because the previous handbook was outdated and did not align with the 2010 Constitution or PLUPA 2019. Addresses issues stemming from rapid socio-economic growth, uncontrolled land subdivision, urban sprawl, uncoordinated development, and environmental damage.
<b>Key Policy &amp; Governance Shift</b>	Focused on operationalizing the mandates of the Physical Planning Act Chapter 286.	Anchored on implementing the Constitution of Kenya 2010, and addresses the paradigm shift presented by Devolution. It aligns with the National Land Use Policy (2017) and the National Spatial Plan (2015-2045).
<b>New Planning Paradigms</b>	Included conceptualizing principles of sustainable development.	Incorporates guidelines and standards on: <ul style="list-style-type: none"> <li>● Disaster Risk Management (DRM),</li> <li>● Blue Economy,</li> <li>● Techno Cities and Smart Cities,</li> <li>● Corridor Development,</li> <li>● Resort Cities,</li> <li>● Groundwater Recharge Basins,</li> <li>● Green Cities,</li> <li>● Advanced Air Mobility (Vertiports).</li> </ul>
<b>Planning for Water Resources (Setbacks)</b>	Defined Riparian Reserves as a minimum of 2m, or equal to the full width of the river, up to a maximum of 30m. Coastal development is allowed with a 30-meter buffer zone from the average high water mark. A lake riparian reserve was defined as a minimum of 2m vertical height or 30m horizontal distance.	Significantly increased protection reserves: <ul style="list-style-type: none"> <li>● Oceans (300m buffer) from the highest watermark.</li> <li>● Lakes (100m to 200m buffer) from the highest watermark (Lake Naivasha specified at 6210ft contour).</li> <li>● Rivers (30m buffer) from the highest watermark. Dams (70m buffer) from the highest watermark.</li> </ul>
<b>Transport Infrastructure Updates</b>	Primarily covered conventional roads, air, water, and railway. NMT is included for integrating transport with recreation (bicycle paths). Specified wayleaves for electricity.	Introduced standards for Mass Rapid Transit Systems (BRT, LRT, HRT), Transport Interchanges (Inter-modal and Road), Electric Vehicle Charging Stations (minimum 0.25ha size), and detailed Non-Motorised Transport (NMT) standards (such as, minimum 3m combined lane).
<b>Development Control Emphasis</b>	Focused on general guidelines for Change of User, Subdivision, and Building Plan approval based on the Physical Planning Act (Cap 286). Mentioned EIA/EA in the Appendix.	Explicitly requires approval guidelines to promote green energy (rainwater harvesting, water storage tanks, solar energy). Introduced detailed procedures for Comprehensive Land Subdivision (more than 19 portions), adhering to neighbourhood planning principles and road width mandates.
<b>Plan Types Covered</b>	Focused on Regional Physical Development Plans and four types of Local Physical Development Plans: <ul style="list-style-type: none"> <li>● Part Development Plan (PDP),</li> <li>● Action Plan,</li> <li>● Advisory/Zoning Plan,</li> <li>● Subject Plan.</li> </ul>	Categorizes plans into Long-term and Short-term. Short-term plans now formally include Integrated Urban Development Plans (ISUDP) (giving effect to the Urban Areas and Cities Act), alongside the traditional PDP, Action Plan, etc. It requires preparing Site Plans.
<b>Data Presentation and Technology</b>	Required graphical presentation showing features like contours, road networks, and land uses.	Mandates that Physical and Land Use Development Plans be GIS-based. Requires standardization of map elements, including using the UTM arc 1960 coordinate system and recommended colour combinations (CMYK/RGB).
<b>New Environmental Sector Standards</b>	Limited to planning for coastal belts, natural resource planning, and wetlands in Chapter Four.	Dedicated sections on Mining (including sand/marram harvesting setbacks), Energy Sources (Solar, Wind, Nuclear, Geothermal, Tidal, OTEC), and Waste Management (Radioactive and Electronic Waste).
<b>Housing Density Standards</b>	Defined residential categories based on acreage (for example, Low Density Urban: 0.2 ha/half acre). Set plot ratios and coverage, such as, Low density maximum coverage 50%.	Updated standards defining density by plot size, plot coverage, and dwelling units. Updated low density to a maximum 30% plot coverage, and High density to a maximum 70% plot coverage. Introduced standards for Mixed Density and Use to reduce social segregation.
<b>Military/Strategic Installations</b>	No dedicated section on military land planning standards.	Dedicated section detailing confidentiality measures, exemption from certain development control/publication processes for Military lands, and requirements for 200m easements along international borders for military deployment.

## 8.2 National Building Code 2024

The *National Building Code 2024* similarly transformed Kenya's construction sector by replacing Legal Notice No. 15 of 1968 (1968 Building By-Laws), thereby closing a 12-year regulatory vacuum that emerged after the repeal of the Local Government Act in 2012. The 1968 code, a replica of British Building Regulations, focused narrowly on conventional materials and lacked provisions for modern construction realities, including electrical wiring standards, fiber-optic networks, solar energy systems, disaster-resilience measures, accessibility for persons with disabilities, and sustainability requirements.

The 2024 National Building Code officially began implementation on 1st March 2025, addressing these deficiencies comprehensively by introducing lifecycle management from planning to demolition, mandatory multi-hazard resilient designs, fire resistance and evacuation requirements, green building practices, and uniform national standards enforced by the National Construction Authority. This replacement marks not merely a technical update but the final removal of colonial-era British standards, aligning building controls with Kenya's devolved governance structure and restoring legal certainty to the construction sector.

### Survey on the Adoption of the National Building Code

AAK conducted a survey to understand members' awareness, experiences, and perspectives on the National Building Code 2024, which came into force in February 2025. Recognizing that effective implementation of the Code is essential to advancing

safe, resilient, and sustainable development in Kenya, the association aims to use the insights gathered to shape targeted advocacy and capacity-building initiatives. These efforts will ensure that AAK's interventions align with members' needs and support the wider uptake and practical application of the Building Code across the built environment sector.

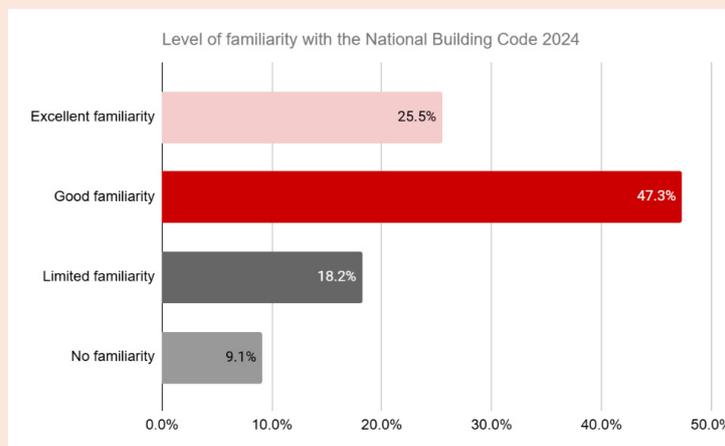
Conducted in November 2025, 55 members of AAK participated in the survey, with the majority (22) being architects, followed by town planners (7), landscape architects (4), construction project managers (7), engineers (5), Interior designers (3), quantity surveyors (4) and environmental design consultants (3).

Most respondents have 11-20 years of experience at 41.8%, followed by those with 5-10 years of experience at 29.1%, and those with over 20 years of experience (14.5%) and below 5 years of experience (14.5%). In addition, more than half of the members (52.7%) work in the private sector, while 18.2% are in the public sector and another 18.2% are contractors. Smaller proportions are represented in academia (7.3%), NGOs (1.8%), and freelance practice (1.8%).

The majority of the respondents reported strong familiarity with the National Building Code 2024, with 72.8% indicating excellent or good understanding. However, 27.3% had limited or no familiarity, pointing to the need for additional sensitization and capacity-building, as illustrated in Figure 7.1.

Notably, 75% of members reported having applied the provisions of the National Building Code 2024 in their work, while the remaining 25% indicated they have not yet done so.

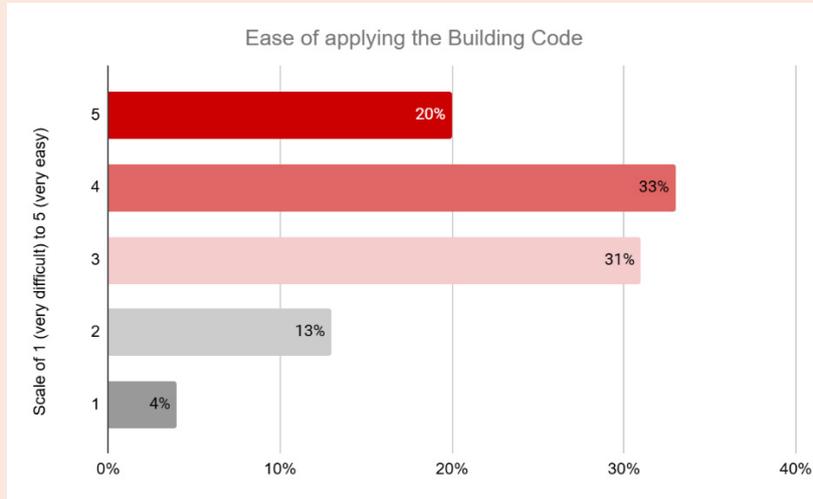
Figure 8.1: Level of familiarity with the National Building Code



Source: AAK, 2025

Respondents generally found the National Building Code 2024 reasonably easy to interpret and apply in practice. Over half (53%) rated the process as easy (scores 4 and 5), while 31% gave a neutral rating (3). Only 17% reported difficulty (scores 1 and 2).

Figure 8.2: Ease of applying the National Building Code



Source: AAK, 2025

It is noteworthy that most respondents who rated the ease of use between 1 and 3 were interior designers, landscape architects, and construction project managers, professions that were significantly underrepresented due to the lack of regulation and are not explicitly acknowledged in the Building Code. This has led to misaligned responsibilities, such as assigning landscape architecture duties to architects and creating overlaps between professional roles. Misinterpretation of key provisions by county officials also emerged as a major issue, especially regarding fire-escape requirements for residential towers, where office-building standards are being misapplied.

Many respondents noted that the Code’s legalistic language, limited accessibility during the initial rollout, absence of illustrations, and inconsistent or unclear guidelines make practical application

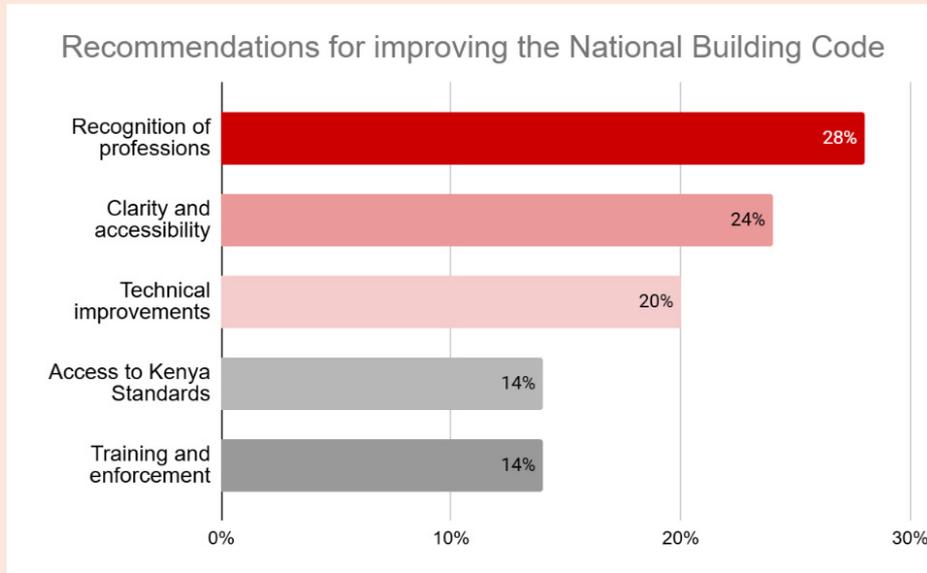
difficult. Additional challenges include low awareness among developers, limited enforcement capacity at the National Construction Authority and the county level, difficulty accessing referenced Kenya Standards, contradictions with other legislation, and gaps in areas such as smart technologies, green buildings, second-hand materials, outdoor spaces, and service provision requirements. Several members also emphasized the gap between the Code’s prescriptions and on-the-ground realities, underscoring the need for ongoing review, clearer guidance, improved training, and stronger enforcement mechanisms across the sector.

Members proposed a wide range of improvements to strengthen the National Building Code 2024 and enhance its practical application, as summarized in Figure 7.3. below.



**75% of AAK members** have already applied the new Building Code in their work

Figure 8.3: Recommendations for improving the National Building Code



Source: AAK, 2025

28% of respondents recommended the formal recognition and regulation of all built-environment professions, including interior designers, landscape architects, and construction project managers, to reflect current practice, reduce role overlap, and curb the rise of unqualified practitioners. This was followed by 24% of members who called for improved clarity and accessibility, including the use of 3D illustrations, summaries, and an interactive online platform to make the Code easier to navigate.

In terms of technical improvements, 20% of respondents emphasized the need for stronger alignment with planning frameworks. This includes clearer guidance on setbacks, building lines, voids, lighting wells, and integration with the 2025 Physical and Land Use Planning Handbook. Fire safety provisions, particularly for residential towers and

point-access buildings, were highlighted as needing clearer differentiation to avoid misinterpretation at approval stages.

Members also recommended better access to referenced Kenyan Standards, ideally consolidated into a single, easily accessible repository. Updates to reflect modern technologies, climate-smart design, and context-specific issues, such as seismic considerations in the Rift Valley, were also suggested. Training and sensitization were strongly emphasized: 75% of respondents reported not having attended any training on the Building Code, while 91% indicated willingness to participate in such sessions.

Finally, members consistently stressed the need for more robust enforcement, improved dissemination methods, and tiered or flexible compliance requirements for low-cost and informal housing.



**28% of respondents** recommended the formal recognition and regulation of all built-environment professions, including interior designers, landscape architects, environmental design consultants and construction project managers

### 8.3. Affordable Housing Regulations, 2025

The Affordable Housing Regulations, 2025, were introduced to operationalize the Affordable Housing Act, 2024, and accelerate the delivery of housing under Kenya's national housing agenda. These regulations aim to make home ownership more accessible by lowering entry barriers and introducing flexible financing models. Key provisions include reducing the minimum deposit requirement from 10% to 5%, expanding tenant purchase schemes,

and creating rural housing loan products to cater to underserved areas.

The regulations also strengthen compliance with existing housing laws by setting clear eligibility criteria, promoting transparency in allocation, and aligning housing development with sustainability standards. Overall, they seek to complement the Affordable Housing Act by ensuring affordability, inclusivity, and accountability in housing delivery.

### 8.4. Nairobi City Regularization of Unauthorized Development Act, 2025

The Nairobi City County Regularization of Unauthorized Developments Act was introduced and passed in 2025 following public participation. Stakeholders, particularly residents, expressed wariness about the Act, specifically regarding illegal buildings whose approval processes were contested or contravened existing zoning guidelines. The Act seeks to establish a legal framework for the regularization of unauthorized developments commenced or completed before the Act's commencement.

The controversial political intervention granted amnesty and created regularization processes for buildings constructed without prior planning permission. The Act represents a legislative solution to executive control failures in stopping illegal construction, effectively rewarding violations of

the *Draft 2021 Development Control Policy* rather than enforcing it. This approach creates perverse incentives, leading developers who violate planning laws to ultimately secure approval through political intervention, thereby fundamentally undermining the integrity of Kenya's development control framework. AAK recommended revising the definition of 'regularization' to cover only applications that have not been originally considered for approval by the County Government.

Other key recommendations included requiring that regularization fees be set at punitive levels to discourage bypassing lawful procedures. These penalties should include reparations to the County, such as fees per excess floor or per setback violation.



### 8.5. Nairobi City County Government Excavation Procedures

The Nairobi City County (NCCG) introduced a new procedure for processing excavation permits effective from the 9th June 2025, aimed at preventing recurring incidents, such as the collapse of excavation sites, that cause grave safety risks.

The new process requires that all excavation permit applications be submitted to the County Executive Committee Member (CECM) for Built Environment and Urban Planning, accompanied by a set of mandatory documents and technical approvals, including:

- Approved Architectural and Structural Building Plans.
- A Geotechnical Investigation Report.
- A Method Statement by a Registered Structural Engineer and Qualified Site Supervisor.
- Details regarding Dewatering techniques.

## 8.6. Summary of Bills Proposed and Reviewed by AAK in 2025

### a. Public Participation Bill, 2025

The Bill aims to improve the quality and integrity of public engagement by requiring minimum notice periods, mandating publication on a centralized public digital platform (in addition to traditional media), and requiring the use of contracted independent experts to educate the public on complex or technical issues, ensuring informed engagement.

AAK emphasized strengthening the procedural integrity of the process by recommending that the Bill should include procedural consequences.

### b. Climate Change (Carbon Market, Credits) Regulations

The proposed regulations include the Draft Climate Change (Carbon Trading) Regulations, 2025, the Draft Climate Change (Non-Market Approaches) Regulations, 2025, and the Draft Climate Change (Carbon Registry) Regulations, 2025.

These regulations seek to streamline processes and strengthen existing laws by defining “Carbon credits” and ensuring that emission reductions

are taken into account when advising the Council on the carbon budget for trading. Additionally, they aim to enhance stakeholder participation in Nationally Determined Contributions (NDC) implementation and to strengthen the Climate Change Act by detailing the operation and content of the National Carbon Registry and integrating them with the principles of human rights and environmental compliance.

### c. Planning Laws (Amendment)

The primary laws under review are the Physical and Land Use Planning Act (PLUPA) 2019, along with amendments to align with the County Governments Act (CGA) 2011 and the Urban Areas and Cities Act (UACA) 2019.

The harmonization efforts seek to address the devolution deficit arising from PLUPA’s omission of crucial grassroots administrative structures (sub-county, ward, village levels) in planning and development management. The journey has involved efforts to clarify the blurred line between policymaking and the performance of planning operations and address the structural issue of liaison committees being controlled by the Executive authorities they are meant to review.



*Plan. Christine Muchiri, representing the Association in Stakeholder Engagement forums on Planning Law Reviews, hosted by SDHUD*

### d. Alternative Dispute Resolution Bills

The bills under review are the Construction Payments Adjudication Bill, 2025, the Dispute Resolution Bill, 2025, and the Arbitration (Amendment) Bill, 2025.

The overarching objective is to consolidate, strengthen, and modernize the alternative dispute resolution (ADR) framework, introducing fast-tracked resolution timelines and binding determinations.

### e. Business Laws Amendment Bill, 2025

The Bill was championed to create a more conducive environment for investment and development. The association called for the establishment of guidelines for technology transfer plans in built environment projects, with measurable targets developed in consultation with professional bodies, ensuring local professional mentorship and skill development.

**f. Nairobi City County Government Draft Transport Act Regulations, 2020**

These draft regulations are intended to operationalize and facilitate the effective implementation of the Nairobi City County Transport Act 2020.

**g. National Standards for Green Building Guidelines**

These proposed guidelines aim to facilitate the development of a national standard for green buildings under the Affordable Housing Programme (AHP), aligning with Kenya's commitment to sustainable, low-carbon development and NDCs.

**h. Draft Physical Planners Registration Board Strategic Plan 2024-2028**

This Strategic Plan sets out a roadmap committed to professionalism, integrity, and sustainable land use planning. The association, through the Town Planners Chapter, recommended various reforms.

**i. Petroleum (Amendment) Bill, 2025**

The Bill seeks to align the Petroleum Act with international best practices covering upstream, midstream, and downstream operations.



*AAK Submitting Comments to the Ministry of Energy during a Stakeholder Engagement Forum*

**j. The Finance Bill, 2025**

The Finance Bill, 2025, actualizes national fiscal policies and outlines key revenue measures.



*AAK submitting Comments on Finance Bill, 2025 during a Public Participation Forum held at the Kiambu National Polytechnic*

**k. National Construction Authority (Amendment) Bill, 2025**

The National Construction Authority (Amendment) Bill, 2025 (Senate Bill No. 15 of 2025) seeks to strengthen the National Construction Authority Act by expanding the NCA's mandate to promote and enforce the use of environmentally sustainable construction materials, designs, and practices. The Bill aims to enhance resilience in the construction sector in response to climate change risks, ensuring that Kenya's built environment adopts standards that support sustainability, safety, and long-term environmental stewardship. In its memorandum, the AAK emphasized the need to align the proposed amendments with Kenya's ongoing decarbonization roadmap efforts and international best practices. AAK further underscored the importance of robust stakeholder partnerships, clarity in sector actors' mandates, and a strong focus on long-term sustainability in the construction industry.

## 8.7. Judicial Interventions Reshaping the Planning Landscape

In a democracy, justice is administered in accordance with the rule of law and guided by the principles of equality, accountability, transparency, and public participation. This ensures that justice is applied fairly and impartially through transparent and accountable procedures that safeguard the rights and freedoms prescribed in Chapter Four of the Constitution of Kenya, 2010.

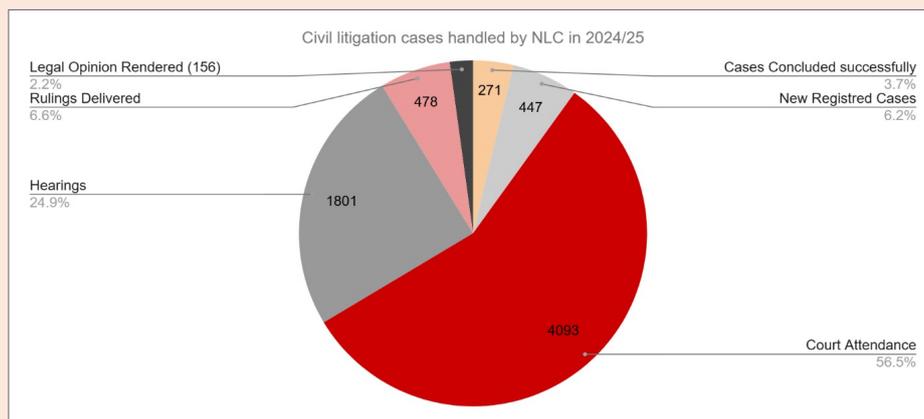
However, where sufficient rules and regulations exist but implementation is defective, litigation becomes an essential and indispensable tool for enforcing compliance. Although the Bill of Rights guarantees all Kenyans inalienable rights and fundamental freedoms, these protections hold little value if the people are unable to exercise them.

Consequently, this has led to growing awareness amongst communities in Kenya, who increasingly view litigation as a mechanism for enforcing compliance, particularly within the built environment, where authorities have often failed to fulfil their mandate. As a result, petitioners are turning to the courts to seek the direct application of judicial authority through conservatory orders, penalties, injunctions, and the clarification or interpretation of laws. Anchored in Article 159 of the Constitution, these matters are addressed through a range of litigation and alternative dispute-resolution mechanisms used by Kenyan courts to handle cases involving construction and development control.

Kenyan courts address construction and environmental disputes through several legal pathways. **Judicial review** enables courts to examine the legality and fairness of administrative decisions. At the same time, **constitutional petitions** are used when constitutional rights, such as the rights to property, public participation, and a clean environment, are violated. **Civil suits** handle matters like breach of contract, negligence, and unsafe construction under the Civil Procedure Act. **The Environment and Land Court**, established under Article 162, deals with disputes related to land use, planning, zoning, and environmental impacts. **Appeals** may also be made to specialized tribunals, such as the National Environment Tribunal, and to **planning liaison committees**, with further recourse to the High Court. Additionally, **alternative dispute resolution** mechanisms such as mediation and arbitration offer faster, cost-effective conflict resolution, and planning authorities may **prosecute** offenders who violate planning laws and development regulations.

Beyond court-led interventions, Kenya's land governance challenges have also manifested in civil litigation handled by the National Land Commission (NLC), the country's public land custodian under Article 67(2)(a) of the Constitution as summarized below:

Figure 8.4: Civil litigation cases handled by NLC



Source: NLC Annual Report 2024/25

Nairobi County accounted for the majority (174 cases) involving institutional and commercial land disputes, followed by Mombasa (22 cases) linked to ports and coastal land, and Kiambu (21 cases) driven by peri-urban development pressures. Additionally, 82 cases involved compulsory land acquisition under the Land Acquisition Tribunal.

These disputes highlight systemic weaknesses in development control and land-use planning, setting the stage for significant judicial interventions in 2025. A series of landmark rulings exposed critical gaps in Kenya's planning framework and reinforced the need for legally anchored zoning and compliance mechanisms.

**i. Parklands Residents Association (PRA) vs The Nairobi City County Government (NCCG) & Others**

On 3<sup>rd</sup> March 2025, the Parklands Residents Association (PRA) filed a petition at the Environment and Land Court (ELC) challenging unapproved, illegal, and irregular developments within the Parklands area. On 5<sup>th</sup> March, the ELC issued conservatory orders restraining the Nairobi City County Government (NCCG) from processing or granting any development approvals in the area pending the determination of the case. In its judgment delivered on 14<sup>th</sup> October 2025, the Court found that ongoing developments without the requisite approvals infringed both the PRA's and the public's constitutional right to human dignity under Article 28, and that developments undertaken since August 2019 had violated the right to a clean and healthy environment as provided under Article 42.

To remedy these breaches and strengthen regulatory oversight, the Court directed NCCG to constitute a County Physical and Land Use Planning Consultative Forum within six months, as required by Section 14 of PLUPA 2019, and to file a compliance report within the same period. It further ordered NCCG to formulate and gazette both the County Physical and Land Use Development Plan and the Local Physical Development Plan for the Parklands area within twelve months. The Court warned that any development approvals issued after the expiry of this twelve-month window would be rendered null and void if NCCG failed to comply.

**ii. Rhapta Road Residents Association vs NCCG & Others**

Earlier in August 2024, the Rhapta Road Residents Association (RRRA) petitioned the courts, citing a pattern of uncoordinated, unregulated developments in their neighborhood that had been approved by the Nairobi City County Government (NCCG) and NEMA. They argued that approvals for buildings of up to 28 floors violated the area's previous height limit of 16 floors. On 19<sup>th</sup> September 2025, the Court of Appeal issued directives requiring NCCG to adopt and gazette Local Physical Development Plans (LPDPs) and a development control policy within six months, and to ensure meaningful public participation, as required under the Constitution and PLUPA 2019. The Court also directed NCCG to periodically submit a progress and a compliance report that includes enacted

planning instruments, participation records, and a capacity-concurrency statement.

In its clarification, the Court affirmed that approvals and licenses already issued in the affected zone remain valid, subject to compliance with construction requirements and post-completion oversight. It further directed that pending development applications continue to be processed under PLUPA 2019, in accordance with the 2021 Development Control Policy and other interim frameworks. Through these orders, the Court of Appeal highlighted the urgent need for a coherent and legally anchored planning system for Nairobi, echoing broader concerns about the absence of parcel-specific zoning regulations and the ambiguity caused as a result

**iii. Mbaazi Avenue Residents Association vs Metricon Home Nairobi Company Limited & Others**

The Mbaazi Avenue case further clarified this planning vacuum when the Court of Appeal dismissed residents' appeals against a 16-storey, 416-unit apartment development in October 2025. While residents argued that the project violated the 2004 zoning guidelines (Zone 4 permits only four-storey residential apartments), the court ruled that those guidelines were obsolete. The judgment emphasized that NIUPLAN cannot be treated as a binding law as it lacks parcel-specific zoning rules or floor limits required under Section 46 of PLUPA. The court noted NIUPLAN could inform and guide decisions persuasively pending formal adoption, but cannot operate as law.

**iv. Mwingi Court Residents Association vs Barasa t/a Gabasa (K) Enterprises & 3 Others**

In contrast, the Mwingi Court Residents Association case delivered a victory for procedural compliance when residents successfully challenged commercial development on plots zoned for low-density residential use. The allegations were construction without change of user licenses, public participation, or Environmental Impact Assessment licenses as required under the *Environmental Management and Coordination Act, 2015* (EMCA) and the *Physical and Land Use Planning Act, 2019*. The court ruling in favour of the residents' association establishes that compliance with the *Environmental Management and Coordination Act, 2015* (EMCA) and PLUPA remains non-negotiable, regardless of uncertainties arising from the planning vacuum.



# 09.

## Climate Action

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A strategic convergence of policy, technology, community engagement, civil society initiatives, and international partnerships has characterized Kenya’s climate action in 2025. These initiatives reflect a growing commitment to restoring degraded ecosystems, enhancing climate resilience, and integrating nature-based solutions into spatial planning and infrastructure development. The following analysis presents key projects and programmes that have shaped the built and natural environment, with attribution to the relevant implementing agencies.

### 9.1. National Building and Construction Decarbonization Roadmap (2026-2040)

#### The Urban Carbon Challenge

Climate change impacts ecosystems, economies, and communities worldwide by altering weather patterns, threatening biodiversity, disrupting livelihoods, and exacerbating social and environmental inequalities. This creates externalities on cities’ abilities to provide basic services, infrastructure, housing, health, and livelihoods. Urban areas produce approximately 70% of global CO<sub>2</sub> emissions, with transport and buildings among the largest contributors.

With Kenya urbanizing at 4.4% and global building stocks estimated to double in the next 15 to 20 years, uncontrolled development and the proliferation of “brown” buildings will continue to exert significant pressure on the existing infrastructure, leading to increased energy demand and resource use, inadequate waste management, heightened air and water pollution, and increased vulnerability to climate-related hazards such as flooding and heat stress. Without deliberate interventions to promote green building practices, uptake of low-carbon materials, and sustainable urban planning, cities risk locking in inefficient systems that undermine resilience, public health, and long-term economic sustainability.

According to the International Energy Agency (IEA), Kenya produced 17.703 million tonnes of CO<sub>2</sub> in 2023, of which 32% were generated by the built environment. Currently, 31.9% of the population

lives in urban areas, with 60% residing in informal settlements, and this is projected to rise to 35% by 2030 and 43.5% by 2040 (32.24 million people). This rapid urban growth increases energy and housing demand, straining water, electricity, and waste management infrastructure, exacerbating congestion, and driving up emissions from industry and transport. It also accelerates deforestation and heightens vulnerability to climate risks, leading to displacements, particularly among vulnerable communities.

#### Why Decarbonization?

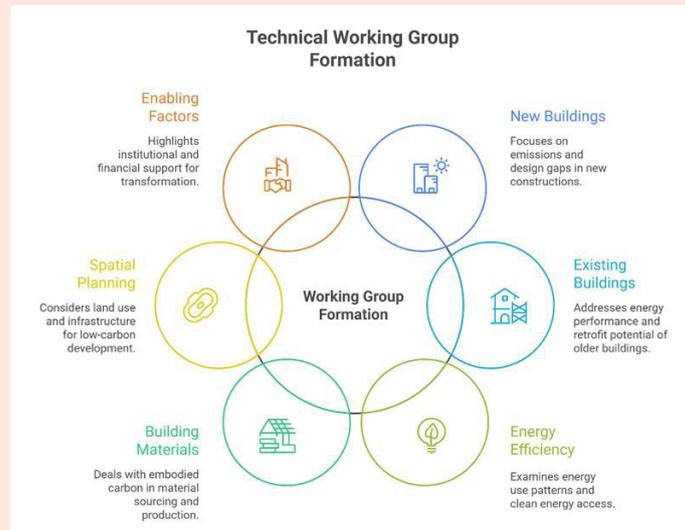
The buildings and construction sector is a major contributor to Kenya’s greenhouse gas (GHG) emissions, accounting for more than 10.7% of total energy-related emissions, with residential buildings contributing 6.2%, commercial and public buildings 4.5%, and industrial buildings and related processes 18.4% (International Energy Agency, n.d.). Decarbonizing the sector is therefore critical to achieving national climate commitments, including the 2025–2030 Nationally Determined Contributions (NDCs), which target a 32% reduction in carbon emissions. Given current energy use patterns – characterized by high consumption, use of carbon-intensive materials, and inefficient practices – the shift towards passive design strategies, sustainable construction materials, and renewable energy integration presents a significant opportunity to substantially reduce these emissions.

## The Promise of Decarbonization for Sustainable Urban Development

Decarbonization involves intentionally lowering emissions through the implementation of carbon-reduction strategies and low-carbon operational practices across a building's lifecycle. The Global Buildings Performance Network (GBPN), at the invitation of the State Department for Public Works, initiated the development of the National Buildings

and Construction Decarbonization Roadmap (2026–2040) in mid-2024 as part of the global Buildings Breakthrough Agenda, with AAK as the lead national partner. The roadmap outlines a carbon-reduction pathway for the industry to help achieve Kenya's NDC commitments, based on six strategic focus areas: New Buildings; Existing Buildings; Enabling Factors; Energy Efficiency; Spatial & Urban Development; and Building Materials and Construction Supply Chain.

Figure 9.1: Decarbonization Roadmap Technical Working Groups



Source: GBPN (2025)

### How this will be achieved

As a signatory to the Buildings Breakthrough Agenda, Kenya committed to achieving near-zero emissions and resilient buildings by 2050. This can be achieved through:

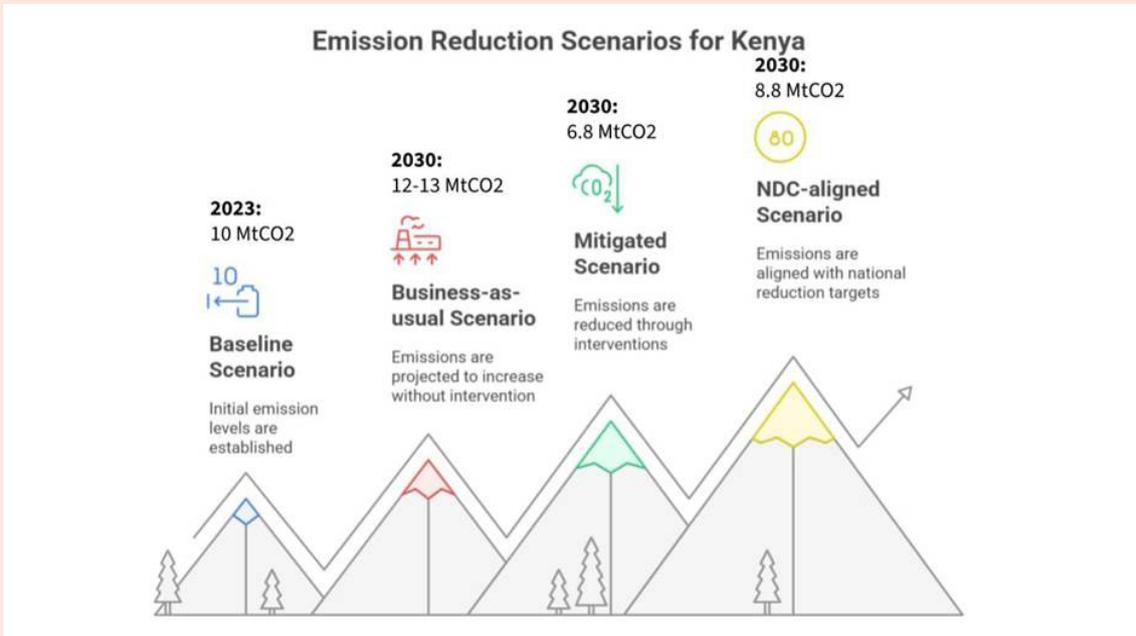
- i. Strengthened coordination between national and county governments: Robust vertical collaboration is essential, given that counties are at the forefront of implementation.
- ii. Partnerships: Strong collaboration with industry stakeholders and the private sector is critical, as the majority of real estate investments are driven by private sector actors.
- iii. Digital integration: This entails enhancing data transparency, enabling cross-sector integration, and mainstreaming digital tools such as Building Information Modelling (BIM) and Lifecycle Assessments (LCA). A shared digital infrastructure will support efficient policy coordination between national and county governments.
- iv. Establishment of a centralized data repository: A knowledge hub will consolidate information from multiple sources and incorporate digital tools to

track and visualize progress on decarbonization efforts.

- v. Green financing: Limited access remains a key barrier to adopting sustainable building practices. This can be addressed by catalyzing green investments, improving access to local funding, and leveraging climate finance from global sources such as the Green Climate Fund (GCF).
- vi. Piloting: Implementing the roadmap's recommendations on select projects will enable testing before a nationwide roll-out. Lessons learned can then be integrated into national regulations and standards, such as the National Building Code 2024 and green building guidelines.
- vii. Monitoring and Evaluation: This enables tracking of progress to ensure accountability, aligned with the NDC monitoring and the Climate Change Directorate's MRV+ framework.

The GBPN estimates that implementing the roadmap's recommendations and targets could reduce the building and construction sector's emissions by up to 8.8 million tCO<sub>2</sub> by 2030.

Figure 9.2: Emission reduction potential for Kenya by 2030



Source: GBPN (2025)

## 9.2. AAK Grow A Classroom Initiative



AAK launched the Grow A Classroom Initiative at Shauri Moyo Inclusive Primary School as part of its commitment to creating sustainable and healthy learning environments. This initiative was implemented in partnership with Crown Paints Kenya and aligned with the AAK Annual Convention 2025 theme 'Shaping the Urban Future'.

## Key activities



- a. Masterplan Development: University students presented proposals for a sustainable school layout, including improved circulation, green spaces, and outdoor learning areas.
- b. Tree Planting & Landscaping: 1,000 timber, ornamental, and fruit trees were planted to enhance the school's environment and provide future resources for construction and furniture.
- c. Mentorship & Engagement: Pupils participated in an art competition envisioning their dream school, while professionals mentored them on careers in the built environment.
- d. Community Networking: Teachers, pupils, university students, and built environment professionals collaborated to promote environmental stewardship and sustainable design.

So far, the association has engaged 6 schools at various levels based on each school’s unique needs. These are:

Table 9.1: Schools engaged by AAK in the Grow a Classroom initiative

No.	School	County
1	Ngara Girls High School	Nairobi
2	Iiani Primary School	Makueni
3	Butere Primary School	Kakamega
4	Esinage Primary School	Kisii
5	Shauri Moyo Primary School	Kisumu
6	Muthaiga Primary School	Nairobi

The goal of this initiative is to improve the physical and natural learning environment, foster environmental consciousness and climate resilience, provide a blueprint for sustainable school development across Kenya, and inspire pupils through mentorship and creative engagement.

### 9.3. The Breath of the City: Why Nairobi’s Next Chapter Must Be Written in Clean Air

By Maryam Wangeshi, Graduate Architect, Healthy Cities Advocate and Coordinator, [UrbanBetter Nairobi Citizens Hub](#)



Source: Urban Better Citizens Hub

Buildings contribute over **10.7%** of Kenya’s energy-related greenhouse gas emissions

As Nairobi charges into a crucial year, the architectural and planning community must face a harsh truth: our current models of urban development are dismantling the right to breathe. The paradox is stark: an economic boom projected to fuel a 3.9% expansion in 2026 is simultaneously accelerating an invisible health crisis. Buildings and infrastructure are not inert objects; they are our city's lungs. And right now, they're clogged.

#### *The 3.7× Breach*

The forthcoming assessments of Nairobi's built environment must be read as a health prospectus. The data is a chilling map of responsibility: the city's average annual PM<sub>2.5</sub> concentration is estimated at 18.3 µg/m<sup>3</sup>, nearly 3.7 times higher than the WHO guideline of 5 µg/m<sup>3</sup>. This breach leaves 100% of Nairobi's population exposed to dangerous levels of pollution. This is not growth. This is suffocation.

#### *The Built Environment's 74% Imperative*

According to the Nairobi City County Air Quality Action Plan, the Source apportionment data is conclusive: Road Transport alone contributes 40% of PM<sub>2.5</sub>. But the most profound indictment is that Traffic and Mineral Dust, the gritty residue of construction and unpaved roads, together account for 74% of fine particulate matter in high-activity areas.

Meanwhile, construction surges forward: cement consumption rose 22.1% year-on-year in the first half of 2025. This expansion must be accompanied by non-negotiable health standards. The old ways of construction must end. Clean air policies targeting Construction, Transport, and Waste Management are no longer optional; they are a matter of survival.

#### *Beyond Bricks: Designing for Equity*

Our professional response must confront inequity. Transport (45%), Waste Management (33%), and Industry (22%) account for the majority of emissions. Within homes, inequity deepens: 26.5% of residents still rely on polluting fuels like paraffin for cooking. When design ignores ventilation and energy equity, it condemns households to inhale poverty itself.

The design of a healthy city is not about aesthetics; it is about justice. Every blueprint for 2025 must integrate clean energy solutions and non-motorized transport infrastructure.

#### *Choosing Breath Over Collapse*

The time for abstract debate is over. Nairobi's next chapter must be written in clean air. 2025 must not be remembered as the year the city choked, but as the year we chose to breathe. We must be the architects of a breathable city.

## 9.4. Other Key National Strategies and Programmes

### a. National Agroforestry Strategy and Landscape Monitoring Framework

In 2025, the Ministry of Environment, Climate Change and Forestry launched the National Agroforestry Strategy 2025–2035 alongside the Kenya Landscape and Ecosystem Restoration Monitoring Framework (FLRMF). Cabinet Secretary Dr. Deborah Barasa describes the strategy as a generational vision, aligning with

Kenya's commitment to restore degraded landscapes and build climate resilience through the 15-billion-tree campaign. The strategy is anchored on six pillars as described below

According to the strategy, an estimated KES 7.17 billion will be required to implement it over 10 years. The strategy spreads the amount across its 6 pillars as follows:

Table 9.2: National Agroforestry Strategy Implementation Cost

No.	Pillars of Strategy	Amount (Mil KES)	Amount (Mil USD)
1	Policy, Legal and Institutional Frameworks	461.00	3.55
2	Finance and Investment	864.00	6.65
3	Education, Research, Innovation, and Knowledge Management	2,980.00	22.92
4	Agroforestry Value Chains Development	1,935.00	14.88
5	Climate Change Action	564.00	4.34
6	Gender, Youth and Social Inclusion in Agroforestry Development	368.00	2.83
	<b>Total</b>	<b>7,172.00</b>	<b>55.17</b>

Data Source: National Agroforestry Strategy (2025-2035)

## b. AFR100 Forest Restoration Initiative

In May 2025, Kenya officially launched the Project Advisory Committee (PAC) for AFR100, marking the start of large-scale restoration in Baringo and Elgeyo-Marakwet counties. This initiative aims to create nature-based jobs, enhance climate resilience, and promote sustainable value chains.

### Kenya's Status and Progress on its Commitments

- **2021–2022:** Kenya reaffirmed its pledge to restore 10.6M hectares by 2032 and launched a 10-year national restoration strategy.
- **2023:** Developed Kenya Forest and Landscape Restoration Monitoring Framework.
- **2024:** FAO and partners began pilot projects in Kerio Valley.
- **2025:** PAC inaugurated large-scale restoration in Baringo and Elgeyo-Marakwet.

## c. Tech4Nature Marine Conservation Programme

In January 2025, the Kenya Wildlife Service (KWS), in collaboration with Huawei and the International Union for Conservation of Nature (IUCN), launched the Tech4Nature Marine Conservation Programme at Kisite-Mpunguti Marine Park and Reserve in Kwale County. This groundbreaking initiative introduces artificial intelligence (AI), underwater cameras, and remote sensing technologies to monitor coral reefs and endangered marine species.

## d. ReSea – Regenerative Seascapes Project

The International Union for Conservation of Nature, together with Mission Inclusion, Global Affairs Canada, and Grassroots Organizations Operating Together in Sisterhood (GROOTS Kenya), launched the ReSea project in October 2025. With \$7 million allocated to Kenya from a \$30 million regional budget, the project covers the Kilifi North, Malindi, and Magarini sub-counties. It aims to strengthen marine protected areas, implement nature-based climate adaptation strategies, and empower women in blue economy value chains. The International Union for Conservation of Nature estimates that the project will reach 80,000 direct beneficiaries in Kenya and 350,000 across East Africa. The initiative aligns with the Great Blue Wall and Kenya's Blue Economy Strategy.

## e. Australia–Kenya Land Restoration Initiative

The Kenya Forestry Research Institute (KEFRI), in partnership with World Vision Kenya and World Vision Australia, the Center for International

Forestry Research and World Agroforestry (CIFOR-ICRAF), and the University of Nairobi, launched the Australia–Kenya Land Restoration Initiative in February 2025. With KES 287 million in funding, the programme focuses on community-led greening and climate adaptation. It contributes to Kenya's national goal of restoring 10.6 million hectares of degraded land and increasing tree cover to 32% by 2032. The Kenya Forestry Research Institute reports that the initiative emphasizes participatory approaches and ecological restoration as a pathway to climate resilience and sustainable land use.

## f. Kenya National Bamboo Development Strategy 2025–2035

During World Bamboo Day 2025 celebrations at the University of Kabanga, Cabinet Secretary for Environment, Climate Change and Forestry, Dr. Deborah Barasa, officially launched the Kenya National Bamboo Development Strategy 2025–2035, emphasizing bamboo's role as a sustainable raw material for construction, textiles, energy, and food. This 10-year roadmap aims to transform bamboo into a national economic and ecological asset, aligning with Vision 2030, the 15 billion Tree Programme, and Kenya's 30% tree cover goal by:

- 1) Expanding bamboo cultivation to 150,000 hectares across forests and farms.
- 2) Establishing a National Centre of Excellence and 20 county incubation centers for technology and innovation.
- 3) Mobilizing KES 15 billion for commercialization and carbon credit opportunities.
- 4) Creating 750,000 green jobs in the first two years through restoration and bamboo-based enterprises.
- 5) Empowering youth and women in bamboo entrepreneurship.
- 6) Recognizing bamboo as a cash crop and integrate into climate action policies.
- 7) Supporting R&D for improved bamboo species and sustainable harvesting

## g. Mau Forest Complex Restoration Programme

The Ministry of Environment and Forestry has initiated a ten-year programme to restore 317,115 Ha of the degraded Mau Forest Complex from a total of 403,000 Ha. Cabinet Secretary Dr. Deborah Barasa has stated that the programme aims to safeguard water towers, protect biodiversity, and support the 15-billion-tree campaign. According to the ministry, the Mau Forest Complex supports over 130,000 families with its economic value worth KES 197 billion and sustains key rivers and ecosystems, including the Maasai Mara National Reserve.

As part of the programme, the Water Resources Authority has adopted blocks of degraded land for rehabilitation, and the Mau Water Fund has been established to coordinate efforts among government, communities, private investors, and development partners. This KES 21.5 billion Mau Forest Complex Integrated Conservation and Livelihood Improvement Programme (MFC-ICLIP) will address deforestation drivers such as illegal logging, charcoal burning, and poor

farming practices.

#### **h. Mara River Basin – Science-Driven Conservation**

The 2025 Mara Day Kenya showcased tangible interventions, including the installation of an electric fence around the Mara forest and catchment area to curb encroachment. Since its establishment in 2012, Mara day’s impact is as follows:

Table 9.3: Mara River Basin Conservation Milestones (2012–2025)

Year	Milestone
2012	Mara Day established by EAC to promote transboundary conservation awareness.
2015	Policy: MoU signed between Kenya and Tanzania on Mara River Basin management; regional bans on plastics begin to take shape.
2016-2018	Physical Interventions: Riparian restoration projects initiated; electric fencing installed in critical Mara catchment areas; tree-planting campaigns under national and community programs scale up.
2019-2020	Science Integration: Annual Mara Day conferences institutionalized; research outputs start informing policy and management plans.
2021	Community Engagement: Formation of Mara River Transboundary Water Users’ Forum; local conservation networks strengthened.
2022	Monitoring: Joint water quality sampling and pollution hotspot mapping launched; data-driven interventions begin.
2023	MMNR Management Plan 2023–2032 launched; 75th anniversary of the Reserve celebrated; blue economy laws integrated into conservation discourse.
2024	13th Mara Day focuses on climate resilience and biodiversity; community-led restoration projects showcased.
2025	14th Mara Day in Butiama: over 60 scientific papers presented; monitoring systems upgraded for real-time water and wildlife data Completion of electric fencing in Mara River Basin to curb encroachment and protect riparian zones

#### **i. Community Stewardship and Multi-Actor Governance in River Basin Restoration**

The Nairobi Rivers Commission, established through Gazette Notice No. 14891 of 2022 and operational from 2023, anchors a multi-agency programme covering a 700 km<sup>2</sup> basin serving over five million residents. Supported by Arcadis, UN-Habitat, World Resources Institute, and major development banks, the programme includes the KES 20 billion sewerage improvement project delivering 220 km of new sewer lines and upgraded treatment systems.

Community-based organizations form the backbone of on-the-ground implementation. In Mathare, groups such as the Mathare Social Justice Centre and the Mathare River Regeneration Network have reclaimed riparian zones, created parks and green corridors, and

piloted innovative waste reduction initiatives. In Korogocho, Komb Green Solutions has restored nearly nine kilometres of riparian land since 2017, establishing multifunctional public spaces. In Kibera, the Kounkuey Design Initiative has delivered 12 public spaces that integrate flood protection, sanitation, and recreation. These initiatives demonstrate that meaningful public participation, consistent with Sections 5-8 of PLUPA goes beyond consultation to active stewardship that aligns local knowledge with formal planning objectives.

The NRC, supported by the National Treasury, has announced a Kenya Shillings 50 billion investment to restore the Nairobi River ecosystem. The programme, set to begin in January 2026, will involve solid waste removal, wastewater treatment, and riparian reserve restoration

## 9.5. Climate-Responsive Urbanism and the Rise of Green Building

Rapid urbanization and intensifying climate impacts require Kenya's built environment to adopt resource-efficient, climate-responsive design. Green building frameworks offer structured approaches that reduce emissions, lower infrastructure strain, and enhance resilience. Certification systems such as EDGE, LEED, and the Safari Green Building Index standards are increasingly influencing market behaviour by unlocking green finance, offering measurable performance metrics, and fostering professional capacity.

As of 2025, Kenya has surpassed one million square metres of EDGE-certified building space, with more

than 150 projects at various certification stages. The adaptation benefits are substantial: energy efficiency supports grid stability; water-saving systems and rainwater harvesting improve drought resilience; passive cooling reduces heat stress; and sustainable materials, combined with stormwater management, lower embodied carbon and flood risk. Scaling these gains requires strengthened building codes, fiscal incentives, green mortgages, and public-sector green procurement. When applied at the neighbourhood scale, green building principles can reduce urban heat islands, lower municipal infrastructure costs, and enhance public health and livability.

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# NAIROBI BIENNALE SEPTEMBER 2026

Shifting the Center: From Fragility to Resilience. Reclaiming Africa's Architecture and the Future

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