



## HCC Response to

### Regional Centre “AAA” Bikeway Network Delivery Information Report

20 May 2025

#### Summary

- The Report lists financial costs but completely ignores the costs in terms of lives lost, injuries, and traumas suffered by people cycling on our streets due to a lack of safe cycling infrastructure.
- The Report offers no reflection concerning why staff and Council have failed to achieve the IMP's deliverables.
- The Report lacks appropriate detail and accuracy when it comes to listing completions, timelines and schedules.
- We find that the design of local street bikeways (LSBs) often fails to meet safety criteria, leading to unsafe cycling conditions. Please see our included DRAFT position paper on this subject.
- The Report attributes all the anticipated adjustments to Halifax's infrastructure (oddly referred to as "risks") to the construction of bicycle facilities rather than recognizing that many of the costs are to avoid impact to motorized vehicles.

The Halifax Cycling Coalition (HCC) has reviewed the most recent Regional Centre "AAA" Bikeway Network Delivery Information Report (the "Report"). We are encouraged that HRM remains committed to continued Biking Network delivery. As a general point, costs for these projects may seem high at first glance but any discussion of total costs should include the offsets that a well structured Biking Network provides by such things as: improving public health due to increased safety and physical exercise, and lower air and noise pollution; efficiencies realized by reducing vehicular congestion; and, reduced road maintenance costs. More specifically, here is a list of our reactions to the issues raised in the report.

1. While “All Ages and Abilities” (AAA) has been used across North America in planning documents, **HCC requests that Halifax stop using the ableist “AAA” language.** Aside from being ableist, the term is not self-explanatory. The facilities alluded to cover a broad range of comfort and safety for people who are willing to cycle. At one end of the spectrum are protected bike lanes which separate people cycling from those



walking and rolling, and from vehicles. At the other end of the spectrum are streets designated as “local street bikeways” (LSBs), which are effectively local streets without protected bike lanes. Many people cycling do not find LSBs as designed and implemented by Halifax safe and thus prefer not to cycle - **safety** is the prime issue, not because they are not “able to.”

2. While the report dwells on risks, it doesn't even mention the biggest risk of all – that through delays and shortcomings in design, more people die and are injured on our streets – surely that should take precedence over the many financial risks listed.
3. A “network” not only consists of roads but also intersection crossings and crosswalks. The safety and comfort of a network must be evaluated based on the safety and comfort of all elements of this network. A significant fraction of vehicle on cyclist collisions occur at intersection crossings. Crossings where people cycling are required to dismount s or intersection crossings where people cycling do not feel safe to cycle impact the “connectedness” of the network. Unfortunately, **the Report only alludes to bicycle phasing in “existing traffic signals” and does not discuss the safety of cyclists at major, high-risk intersections and arterial and collector roads. Nor does the Report address the uniform need for “half signals” where LSBs intersect with high traffic streets, as residential development and aggressive traffic only increases. Leaving people on bicycles to cross at crosswalks is effectively “design for entrapment” as crossing while mounted is logical and safer but illegal.**
4. The Report fails to acknowledge that despite Halifax not meeting its stated goal of completing the “network” by 2022, people are actively cycling in the city. We know this from the data based on bike counters and Statistics Canada data,<sup>1</sup> and we know this because of the data that shows the rising number of vehicle-on-cyclist collisions. Yet, **this Report is more about “bricks and mortar” and not about people, “able” or otherwise, and safety. It gives the impression that people cycling have to fit within the narrow parameters of engineers and planners, and should have no voice beyond**

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<sup>1</sup> Based on data from Statistics Canada: From May 2023 to May 2024, Nova Scotia reported the fastest growth in the share of active transport commuters “Nova Scotia reported that 8.6% of commuters relied on active transportation such as walking or cycling. This was the highest share of active transportation commuters among provinces. Nationally, 6.0% of commuters used active transportation, with the lowest portion in Alberta.” Commuters in Victoria and Halifax most likely to walk or bike to work “Active transportation was more prevalent in Victoria (18.7%) and Halifax (12.3%) than in other CMAs, potentially driven by the smaller size and milder climate of these cities.”



some “check the box” style community engagement. Has the Report given a moment’s thought to costs in terms of lives lost, injuries, and traumas suffered by people cycling on our streets?

5. A “network” must meet certain safety criteria (like NACTO guidelines for LSBs; see the draft HCC Position Paper on LSBs). Unfortunately, Halifax does not design its LSBs in such a way that the facility is guaranteed to meet these criteria. As a result, **many LSBs designed and built by Halifax do not meet the LSB criteria. So, when the staff claim that “To date ... approximately 60% of the network” has been completed, what exactly do they have in mind? The lack of detail and evidence, and the abundance of self-referentialism in the Report is palpable. For even a small example, the Liverpool LSB is shown in Table 1 to be CC, Construction Completed. This is incorrect - no half traffic signals are in place to safely cross high traffic streets like Windsor, Oxford, and Connaught.**
6. A “network” must be designed along the most direct routes of travel by people cycling and must meet their varied needs. A network must be designed based on actual mobility needs with input from people cycling. Halifax plans for and designs its “network” largely based on convenience (like along institutional lands), without any neighborhood approach to planning, and often with a single-minded goal of “connecting” one “end” of the network with the other end, no matter how inconvenient for people cycling this connection might be and without considering whether these connections go through schools, parks and playgrounds and food outlets. The network appears to be designed for the convenience of planners and engineers and lacks such considerations.
7. **The Report does not mention Halifax’s goals for modal shift.** Surely investment in safe cycling infrastructure would help Halifax achieve that goal. Yet, how are you supposed to hope that people will shift from car to bicycle commuting, if it is far shorter and more direct by car? How are families and kids being encouraged to get to schools by bike when there is a lack of bike lanes, let alone direct connections (ie., schools like the new Francophone school and Oxford Jr High School)? .
8. According to the staff’s own admission, a network that was supposed to be completed in 2022 is not even 60% complete. **We are deeply concerned that the Report offers no self-reflection concerning why the staff failed to deliver.** What are the lessons



learned regarding the culture within the municipality? How about the allocation of resources? What needs to change in terms of staffing and management style? Where are the bottlenecks in the system and what is being done to alleviate them? No institution can advance without reflection and some auto-criticism. Thus, we are left to wonder.

9. The Report prefers to use vague language to give the impression that the “network” is a huge “burden” to the city and a huge “inconvenience” for everyone else. For example, the Report writes: **“In some cases**, bus stops must be relocated to accommodate the new bikeway”, “Projects **frequently** require the relocation of existing overhead and underground utilities” or “The removal or relocation of parking spaces or business patios within the existing corridors is **often** required” [emphasis added]. Not only are such **unknown quantities and lack of detail inappropriate for an “information” Report**, but these claims also start from the unacceptable position that bikeways are responsible for such “risks” (and we are unsure why the term risk is even used here if there is perfect certainty about say the location of a utility pole). If Halifax were to give to people cycling the space they need, following the IMP priorities and the inverted triangle, all such burdens and inconveniences would have been automatically seen as the staff’s and council’s decisions to allocate the existing road space to vehicles and on-street parking and then engage in awkward acrobatics to build biking infrastructure. **We thus reject the notion that the “risks” listed in the Report are attributable solely to bikeways.**
10. **The report fails to observe that the high costs of cycling infrastructure (although piling in comparison to amounts spent on roadways for cars) are not the costs of accommodating bicycles but rather the costs of avoiding impact on cars.**
11. **The Report mentions “program delivery schedule.” We are not aware of any such schedule or timeline.** Halifax has not only failed to meet its own stated goals, but has refused to commit to any “program delivery schedule.” MacDonald Bridge Connection is a case in point. After many years of inaction, we are not aware of any design or timeline (other than the flyover is no longer to be built, though it is still used in this report as a “risk”). Inside the municipality, this appears to be seen as something people cycling should simply live with. The Transportation Standing Committee must appreciate the frustration this issue has caused among the cycling community and understand why



there is a growing sentiment that the Council has failed to hold the staff (and itself) sufficiently accountable.

12. The Bicycle Network project's estimated costs, from the outset, have almost quadrupled, yet this Report frames this as being solely due to 'Risks' (that were or should have been known all along) and inflation. How much of the cost overrun is due to inaction driven by embedded car centric practices? How much of this is due to not prioritizing the IMP unanimously approved by the Council in 2017? How much of this is due to a lack of accountable goals and deadlines? The bicycle community rejects the viewpoint, which this Report is largely based on, that people cycling and who wish to be safe on the road are an unjustifiable financial cost.

Cities across Canada and the world are recognizing the need for a **rapid transformation** to non-car-centric design and infrastructure. Halifax needs to share this vision and be part of this transformation. We invite the Councillors to change the tone of the conversation from superfluous risks to real risks we are facing.

Respectfully submitted,  
Halifax Cycling Coalition