



Response to
Integrated Mobility Plan Action Plan
from Halifax Cycling Coalition and Walk 'n Roll HFX

Executive Summary

We represent the two most sustainable forms of mobility (walking and rolling, and cycling). We would like to offer our thoughts on the Integrated Mobility Plan Action Update (IMP Update) released on 19 March 2026. We entirely agree with the almost self-evident observation that “achieving targeted [population] growth increases in the municipality will likely require a significant mode shift from driving to transit and active transportation.” We also agree with the statement that

“The IMP is a sound, visionary plan that is recognized at a national level as an example of good transportation planning. Its vision and principles remain relevant.”

Yet, the IMP Update does not meet the original intent of the IMP. Instead, the proposed actions will perpetuate a car-centric mobility, and shift the costs of worsening congestion, transit reliability, and more seriously, road safety to the residents during a period when you will be presiding over this “action” plan. **Specifically, the IMP Update aims for, at best, 73% more vehicles on our streets.** If that is success, what does failure look like?

Given that the IMP Update is already almost four years past the five-year review of the IMP, we strongly recommend that staff initiate a genuine (beyond the extremely “limited”) engagement with the stakeholders to share perspectives and collaborate to produce a stronger action plan that will truly serve HRM.

We have the following concerns:

- The Update lacks any analysis of the consequences for congestion and road safety of the anticipated growth of automobile trips (imagine for a moment up to 75% more than



what we have today by 2050) and how this might lead to a catastrophic future for Halifax's roads unless Halifax targets a significantly more ambitious modal shift (see **More Cars not Less** below).

- The IMP Update introduces an “equity pillar”, yet lacks substance, which feels like “equity-washing”: in lieu of the equity statement guidance in the current (and proposed) IMP Pillars. The IMP Pillars and the inverted triangle were carefully designed to address significant equity concerns by people walking, rolling, cycling and using transit.
- We sense a real potential for backsliding concerning the IMP priorities (the so-called inverted triangle) and complete streets (Action items 14 and 17), as the IMP Update puts no discernible guidance or constraints on staff who can interpret the IMP “in context” designing infrastructure that completely contradicts the principles of IMP, and who can unilaterally rule out a complete streets redesign, raising serious concerns about transparency. We strongly recommend revising the wording of these action items so that the inverted triangle and complete streets are defaults, not something seen as optional and can be arbitrarily discarded with infinitely elastic statements like “not all streets can serve all purposes”. We don't think such empty language has a place in a planning document, in particular an 'action' document.
- We need clarity on the reported completion rate of the “AAA network”, given that many segments of that network are local street bikeways that do not meet any of the NACTO criteria, and hence cannot be counted toward “completed.” We are deeply concerned about the possible misrepresentation of facts. Where is the response to the motion Council passed to revisit the standards for Local Street Bikeways?
- The report contains evidence-free language concerning the claims about the causes of emergency response times (see **Troubling and Unsubstantiated Claims** below).
- While we are extremely pleased to see that there will be a benefit-cost analysis with a “mobility lens” (Action Item 4), there should be a progress report on the IMP Project Evaluation Scorecard. This was in the IMP, and further requested by the TSC in March 2023. Such benefit-cost analysis must be used to prioritize AT projects, like the MacDonald bridge connection to Halifax. (We would be happy to share with staff the latest developments on evidence-informed prioritizations which have been consolidated in virtually a “cookbook” approach.)
- The report makes a reference to the current “political climate”. This is understandable. However, staff reports should not second-guess political constraints and should only



refer to professional best practices and provide evidence-based advice. Ultimately, councillors make the final (political) decision.

- The transit component of the Update heavily relies on the bus rapid transit (BRT), which is seeing major cost escalation, is severely underfunded, and is not intended to address congestion concerns in the short term. (See the HCC presentation to the TSC on March 26, 2026, for concrete recommendations.)
- Why should we expect the IMP Update implementation to be any different from the badly delayed IMP implementation? The report shifts all responsibility to “external” factors without any institutional self-reflection, raising serious questions about accountability.

More Cars, not Less

The IMP Update states that

“The IMP’s overarching objective is to improve the efficiency and sustainability of how people and goods move about the region, with a key goal of decreasing reliance on single occupancy automobiles by improving mobility options and encouraging supportive land use patterns.”

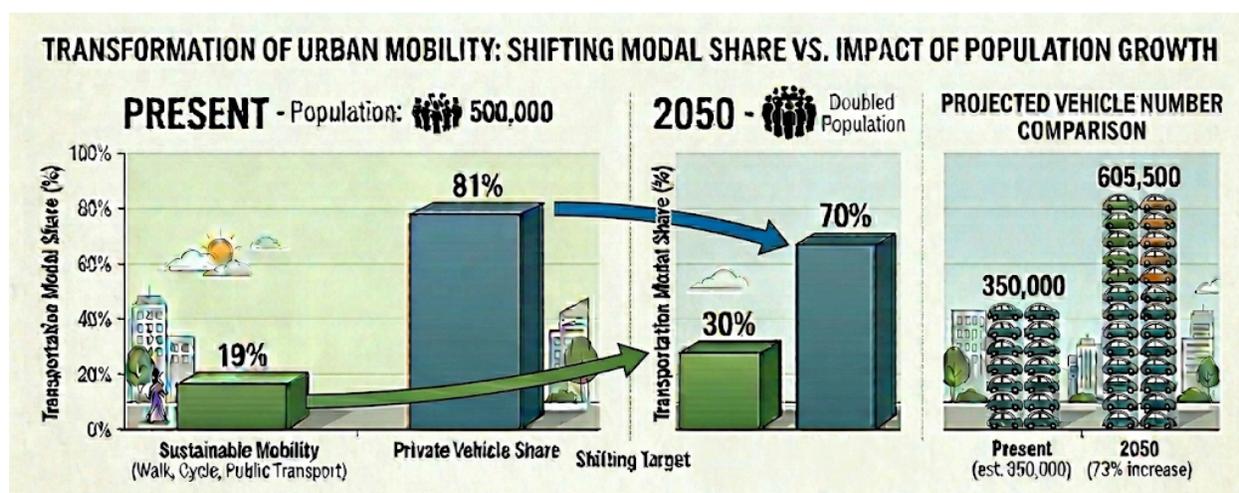
This objective was and remains critical for a Halifax that is affordable, sustainable, and liveable. Yet, recognizing that Halifax has made little progress in improving mobility options and thus reducing reliance on single occupancy vehicles, the Regional Transportation Plan released on 6 August 2025 felt compelled to make the following point, which is worth quoting at length:

*Across North America, the historical focus of transportation planners and engineers has been on expanding road capacity in response to growing travel demand. However, evidence from growing regions shows that this approach simply encourages more people to drive. This can lead to a cycle of continuously widening roads **without achieving a sustained reduction in congestion, travel times, or GHG emissions**. When faced with limited space, congestion can exacerbate conflicts between users, reducing road safety, and degrading the quality of community and public spaces. To accommodate the anticipated growth and associated demand from both the movement*



of people and goods, and achieve lasting improvements, **new approaches are needed.**
[emphases added]

We ask staff and councillors to reflect on the **urgency** of this new approach: even with a modal split whereby 64% (11% as passengers) of commuters into the Regional Centre travel in automobiles (RTP Fig.3.9, and IMP Update Fig.3), given that the population of the Region is expected to double by 2050, **there would be an unsustainable, maddeningly large 73% increase in the number of automobiles driving into the Regional Centre.**



This is the best the plan proposes to do. Can you imagine Halifax with 73% more vehicles on the streets? **We must have a more aggressive plan that will achieve a much greater modal shift than the proposed 30% or be doomed to crippling congestion.**

How does this council plan to **increase the number of automobile trips** without more delays and increases in emergency vehicle response times that are projected by this IMP Update? We have not seen any data regarding the implications of increased automobile trips on congestion even with the presumed modal shift. What happens if Halifax does **not** invest in AT and transit infrastructure? Where are the numbers? We have a right to know.

We have seen what happened over the last several years with increasing populations and cars on roads. We cannot hope to change the rules of arithmetic and laws of physics by appealing



to vague notions of “cultural shift.” Yet, the IMP Update states that “There is a culture shift that is required for these kinds of changes to be understood and considered acceptable to a wider majority of the population.” We should see estimates of the numbers that can be achieved.

Who gets to decide that Halifax needs a “wider majority” in support of AT? How much wider? To us, this impossible statement points to where the culture shift must occur. So, **we recommend that the said culture change start within the municipality, with serious self-reflection, with staff embracing evidence-based decisions, and accelerating modal shift.**

Troubling and Unsubstantiated Claims

The IMP Update report in one critical point uses a slight of hand to make a troubling and unsubstantiated claim:

*“Most often, street right-of-way is limited and to add new features (i.e., bikeway, sidewalk, bus lane), other elements of a street need to be modified – this **can** require reductions in traffic lane width and/or capacity, which impact traffic flow for general traffic. Operational impacts, including potential increases to response times for emergency vehicles, **has been a difficult trade-off** to consider on many projects, especially as emergency responders are under pressure to meet more stringent response time targets” [emphases added].*

We have **strong objections** to the logic of these statements and seriously question their validity:

- It is hypothetical and evidence-free, and such statements must be accompanied by credible evidence: can the staff please inform us about the increase in emergency response times, and whether these increases are, even in zones without any protected bike lanes, due to non-existent protected bike lanes or automobile-driven congestions in arterials and main collectors?
- Given that the safety and comfort of people walking is a top IMP priority, why does the staff perceive a new sidewalk as problematic and a cause for delaying emergency response vehicles? Can staff provide some examples with evidence where this has ever occurred?



- Credible evidence requires an estimate of emergency response times when modal shift does **not** occur and congestion gets worse over time due to increased automobile traffic.
- Credible evidence requires an analysis of “other elements of a street” that are NOT modified—when a protected bike lane is alleged to reduce traffic lanes while on-street parking is maintained, the staff must acknowledge that it is not the protected bike and traffic lanes that are “causing” the increased travel times but the on-street parking. Parking is not a mode of transportation but uses road space that could have been devoted to emergency vehicles.
- Credible analysis must also acknowledge that emergency vehicles can and do travel along dedicated bus lanes, sufficiently wide protected bike lanes, and bidirectional protected bike lanes. These options are common practice in other jurisdictions.
- Many emergency responses are for motor vehicle crashes. Do staff have any estimates about the potential decrease in crashes if modal shifts were happening and how many emergency vehicle trips would have been saved?

We are including further detailed feedback below. Given the very serious and numerous concerns, particularly that the IMP Update fails to address the challenge of increasing population, dooming us to, at best, 73% more vehicles on our streets, our only recommendation is to send it back for public engagement and modification to meet the very real challenges we face. We have waited four years for this Update. We can wait a little longer to get it right.

Respectfully submitted,

HCC & Walk 'n Roll Halifax



Addendum (Additional Concerns)

Application of link-place street hierarchy potentially to undermine complete streets approach (new actions #1, 14) – We are concerned about the potential for the proposed link-place street classification hierarchy to provide another policy rationale for making exemptions to applying the complete streets approach. If a given street is deemed to have a high “link” function for motor vehicles, will this be used to justify failing to apply a complete streets approach?

Bicycle parking (new action #9) – We are supportive of the inclusion of bicycle parking requirements and design requirements in land-use planning documents. The proposal to explore potential “updates and additional detail” in such documents should examine whether existing bicycle parking requirements adequately accommodate different types of bicycles, such as e-bikes and cargo bikes.

Bus rapid transit (new actions #22, 23, 24, 25, 28) – The province and mayor have proposed allowing cars with passengers to use transit lanes, subjecting buses to car congestion and therefore negating the purpose of the transit lanes. Bus rapid transit seems to be key to the municipality’s plan to achieve higher transit modal share, but the plan is at risk if cars are allowed to clog up transit lanes. Allowing cars in bus lanes will also make cycling worse, as bicycles are permitted in many Halifax bus lanes.

Existing bus lanes already suffer from poor driver compliance possibly tied to insufficient enforcement.

Community support and the need for public education – The staff report (p. 12) notes that the public may lose confidence in the approach of the IMP, putting the plan in jeopardy. This risk is exacerbated by the apparent political strategy of the mayor, who has positioned himself on one side of a manufactured bike lane culture war.

To mitigate the risk of diminishing public support, there is a need for public education to counter some of the myths put forward by detractors of investment in sustainable transportation. There may be a public perception, for example, that the bike lane program is a dominant spending priority, which is untrue. An effective campaign might, in countering this perception, educate the public about the cost of cycling infrastructure relative to overall spending.

Funding – Many elements of the IMP and related plans (such as the Rapid Transit Strategy and Active Transportation Priority Plan) are not adequately funded. It is not necessarily that we do not have the money, but that vast resources are instead poured into supporting car transportation and low-density land-use planning. This is a choice that is at odds with the IMP.



Separately, a congestion charging program could generate funds for transit and cycle infrastructure while simultaneously serving as a road demand management mechanism.

Identification of new sidewalks, multi-use pathways and enhanced crossing treatments (original action #7) – It is unclear how this is achieved by the new action #1 as described. Does this actually fall under the new Active Transportation Priorities Plan (new action #21)?

Land use – In addressing congestion, the municipality should build upon an existing strength, the high modal share of walking and cycling in the Regional Centre, by allowing more people to live and work in walkable areas. The reforms to planning documents carried out under the Housing Accelerator Fund has helped to produce many new “missing middle” and high-rise apartment units in areas where residents can walk or cycle to employment and other destinations. However, a large proportion of new residential development is simultaneously taking place in suburban peripheral areas where most residents have little choice but to drive. Restrictive land use plans still limit multi-unit development in some highly walkable parts of Halifax, such as the South End.

Regional Centre All Ages and Abilities (AAA) Bikeway Network (new action #17) – Implementation of the AAA bikeway network is seriously delayed. There are glaring gaps in the bikeway network and cycling infrastructure has often been implemented to a standard that is not suitable for “all ages and abilities”. The above factors contribute to slow modal shift, giving an impression to detractors that bike lanes are seldom used, thereby fuelling a backlash to cycling infrastructure. The slow pace of implementation contrasts sharply with swift progress on motor vehicle-oriented projects in the city such as the Windsor Street Exchange redesign. In light of funding challenges, can the AAA bikeway network be completed expeditiously and to a genuinely AAA standard?

Relationship with provincial initiatives – The IMP and the complete streets approach is contrary to many aspects of the provincial government’s apparent priorities for transportation in the Halifax region. The action plan acknowledges this, identifying the risk of the province stepping in under Bill 24 to prevent the municipality from implementing IMP actions. Public education to counter some of the myths about congestion and bike lanes (see above), and promote the benefits of sustainable transportation, could help to undercut support for provincial interference in municipal transportation initiatives.

New action #12 – It is not clear what this action entails. What is meant by “Rationalize existing networks that prioritize walking, rolling, cycling, transit and driving” ?

Support for cargo transportation by rail to help reduce truck traffic – The municipal government is Halifax’s largest provider of new, serviced non-residential lands to industry (in the



form of business parks). Despite proximity to an active industrial rail line, the newly developed area of Burnside Industrial Park (Phase 13) is entirely reliant on roads for the transportation of cargo, as is the recently developed Atlantic Gateway Halifax Logistics Park which similarly has no rail service. We suggest that the provision of rail-ready sites be explored as part of further business park development (e.g. Burnside Phase 14).

Traffic management centre – The report proposes to establish a “*centralized traffic management centre, seeking to leverage technology to more effectively respond to real-time conditions and improve the efficiency of the existing road network*”. We know that the cause of traffic congestion in Halifax is the overabundance of cars. Employing “technology” to potentially move marginally more cars down clogged urban streets is not a meaningful solution. Focus on real, proven solutions rather than tech hype: provide quality alternatives to private car ownership. Make it easy to walk, bike, and take transit.

Transportation demand management (new action #16) – The staff report notes that the early years of the COVID-19 pandemic saw a “sharp rise in remote work” which caused a decrease in transit ridership. However, remote work also temporarily reduced or eliminated congestion. The Halifax Regional Municipality and other major employers forced staff to return to the office, contributing to worsening traffic. Transit delays have increased as a result. Allowing municipal employees more flexibility in their working arrangements is low-hanging fruit in countering congestion and speeding up transit.