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**Re: Consultation on P43 Specification for traffic  
signals**

Cycling Action Network advocates for the interests of people riding bicycles for everyday purposes. We comprise 24 affiliated local advocacy groups, plus several hundred individual members.

We are not qualified to offer technical comment on the proposed Specification. However, we make the following overarching comments:

1. In case of a systems failure for regular traffic signals, the failure is signified by an orange flashing light. There is no corresponding indication for failed cycle-specific signals;
2. Our members report that bicycles frequently fail to activate traffic signals, both in car lanes and in designated bicycle lanes. There are two potential issues relating to this question in the draft Specification:
  - a. There is no requirement in the draft Specification for a documented programme of regular checking past the post-installation testing. This requirement must include testing for reliable bicycle detection in motor vehicle lanes where there is no cycle lane;
  - b. There is no requirement in the draft Specification for street markings showing the optimum positioning of the bicycle so that it triggers the traffic signal sensor.

Both issues are important, because people on bikes are expected to obey traffic signals. Systems failures breed disrespect for traffic signals, and are thus an important contributor to ill-feeling between people riding bikes and people driving vehicles.

David Hawke  
Secretary  
On behalf of Cycling Action Network