

Feedback Form – Draft revised ‘Hackney Carriage and Private Hire Licensing Policy’

Please share your thoughts on the proposed change to the current policy in relation to window VLT percentage. The committee agreed to reduce the VLT (Visible Light Transmission) of rear side facing windows from 50% to 30%.

The policy will now read -

All Private Hire and Hackney Carriage vehicle windows must meet the requirements as prescribed by the Road Vehicles (Construction and Use) Regulations. (75% light transmission (VLT) windscreen, 70 % light transmission (VLT) front passenger windows). In line with DfT Taxi and private hire vehicle licensing best practice guidance, windows rear of the vehicle B pillar shall have a VLT figure of 30% or above to maintain passenger confidence whilst ensuring a wide range of vehicles may be licensed. Vehicles already licensed at the date when this revised policy came into effect will continue to be licensed until they are replaced. Replacement vehicles (permanent or temporary) must comply with this condition.

Respondent	Comment	Officers comments and recommendation to Licensing and Appeals Committee
1	"Streamline supports this proposal"	Agrees with proposal
2	"Tinted windows: I am opposed to this as this may lead to changing factory fitted windows all together costing the drivers hundreds of pounds extra and add to our cost of living crisis we are already enduring. The council committee should consider accepting the UK manufactured factory fitted windows tint ratio in my opinions."	This reads as an opposition to any VLT figure being imposed rather than an opposition to the proposed reduction.
3	"It's very difficult to find a car with this specifications we should be allowed whatever it's road legal by dvla "	The current proposal aligns with DfT guidance however it is apparent current design and manufacturing may be outpacing such guidance

4	"I am opposed to this as this may lead to changing factory fitted windows all together costing the drivers hundreds of pounds extra and add to our cost of living crisis we are already enduring. The council committee should consider accepting the UK manufactured factory fitted windows tint ratio in my opinions. "	This reads as an opposition to any VLT figure being imposed rather than an opposition to the proposed reduction
5	"Object 50% is fine , there is enough visible to see passengers through . There are majority of vehicles coming with privacy glass, which does have 50% or plus visibility. Also if you bring down to 30% , that will make taxi driver choice of vehicle very less to buy . Pls consider this thanks "	This reads as a potential misunderstanding of the proposed change but also an opposition to any VLT figure being imposed.
6	"Reducing the figure to 30% will not be sufficient as most of the newer vehicles available will fail with standard factory fitted windows. The limit needs to be lower within national regulations "	DfT guidance gives a figure of 30%
7	"This is very inportent but as a taxi driver when the window is manufactured tinted I think it fine Because we have to keep l'm our mind buying taxi cars in Tonbridge and Malling only have 2 colours allows now if we add window to find less tinted it will be more to get taxi we already suffered and pay more money for white colour I think council should be little bit considerable for this matter "	Hackey Carriage vehicle colours are generally restricted to White or Silver unless it is a wheelchair accessible vehicle, in which case there are no colour restrictions
8	"I support the reduction of the minimum VLT requirement for rear side windows from 50% to 30%. This change aligns with Department for Transport guidance and reflects modern vehicle manufacturing standards, where rear privacy glass is common. A 30% VLT maintains an appropriate balance between passenger safety and comfort, while allowing a wider range of vehicles to be licensed. The proposed approach is practical, proportionate, and fair. Thank you for considering this response."	Respondent agrees with proposal
9	"30% will not suffice, it needs to be reduced to the national standards. Most new vehicles now have tinted windows that will still fail at a 30%."	DfT guidance for Taxis gives a figure of 30% which is why we are proposing the change.

10	"All factory fitted tinted windows should be allowed to be licensed and any after market tints should be no darker than 20%"	Placing a specific restriction on aftermarket tints will require additional officer time to check and enforce as it may not be evident from a simple visual check whether the tint is 'aftermarket'
11	"I understand that most cars now have a factory tint of between 19-30% so your proposal would not allow us to buy anything but a base model vehicle. I think the regulations should allow any standard factory tint. Regarding aftermarket tint then it should be allowed if over 20%."	DfT guidance for Taxis gives a figure of 30% which is why we are proposing the change.
12	"30% is not sufficient, you should allow all factory fitted tints as they are generally below 30%"	DfT guidance for Taxis gives a figure of 30% which is why we are proposing the change.
13	"I don't see the difference if it's manufactured glass fitted when vehicle built it should be okay "	DfT guidance for Taxis gives a figure of 30% which is why we are proposing the change.
14	"I think these changes are good for all taxi drivers."	Agrees with proposal
15	"According to research made by one of our colleagues, the tinting level on majority of cars in UK is below 30%, a wide range of 20%. To still put a percentage on tint level is not helping the business at all. Maybe it can be considered to lower it more, or to mention that no off the market tinting is allowed, only factory fitted tinted. "	Officers do not propose going down the route of an 'aftermarket' restriction as it will take additional time to check.
16	"This will make no difference in buying a new vehicle as most new vehicles have a darker factory tint that is suggested by the council allowing all factory fitted tint would be the answer."	DfT guidance for Taxis gives a figure of 30% which is why we are proposing the change.
17	"I agree with the proposed change of the current policy "	Agrees with proposal

18	"Agree with those changes "	Agrees with proposal
19	"It is increasingly difficult to purchase a suitable car without rear tinted windows so therefore I propose factory fitted rear door tinted windows and rear window should be permitted but aftermarket tinting should be restricted "	Officers do not propose going down the route of an 'aftermarket' restriction as it will take additional time to check.
20	" 'My own research shows that reducing the VLT minimum level to 30% will make no difference at all as 40 of the 44 vehicles I tested had factory fitted windows of below 28% with only two of those 40 above 26%. The committee members were in favour of allowing any vehicle with factory fitted tinted glass to be permitted with aftermarket tint being prohibited. I would agree with that but maybe allow aftermarket tint of above 20% VLT. Tinted glass protects passengers from excess UV light, and provides a more comfortable travelling environment. My own survey of customers preferences over a 5 month period of over 400 journeys show an almost unanimous preference for tinted windows, with no passengers concerned that their safety could be compromised by the rear windows being tinted, and less than half a dozen who did not have a preference either way'. I ask that all TMBC Licensed drivers please take 5 minutes to respond to this very important consultation. Your choice of future vehicles will be severely limited if you agree to their proposal for a minimum VLT of 30%!"	The current proposal aligns with DfT guidance however it is apparent current design and manufacturing may be outpacing such guidance
21	"My own research shows that reducing the VLT minimum level to 30% will make no difference at all as 40 of the 44 vehicles I tested had factory fitted windows of below 28% with only two of those 40 above 26%. The committee members were in favour of allowing any vehicle with factory fitted tinted glass to be permitted with aftermarket tint being prohibited. I would agree with that but maybe allow aftermarket tint of above 20% VLT. Tinted glass protects passengers from excess UV light, and provides a more comfortable travelling environment. My own survey of customers preferences over a 5 month period of over 400 journeys show an almost unanimous preference for tinted windows, with no passengers concerned that their safety could be compromised by the rear windows being tinted, and less than half a dozen who did not have a preference either way. "	Apparent duplication of respondent 20 The current proposal aligns with DfT guidance however it is apparent current design and manufacturing may be outpacing such guidance

22	"No problem with that but luxury cars should have more relaxed as driver is invested a lot of money for it. "	Agrees with proposal. To confirm plate exempt vehicles usually carrying out executive work are already exempt from the current VLT restrictions and would continue to be even after any changes.
23	"I think they should stay as the police and law allows"	DfT guidance for Taxis gives a figure of 30% which is why we are proposing the change.
24	"This idea is absolutely fine as most cars coming from factory with darker back windows from the B pillars "	Agrees with proposal
25	"I strongly support the proposed change to reduce the rear side window VLT to 30%. This adjustment aligns the policy with modern vehicle manufacturing standards, as many newer models come with factory-fitted privacy glass. This change will make it much easier for drivers to license a wider range of high-quality vehicles without the unnecessary cost of replacing glass"	Agrees with proposal
26	"Most modern vehicles that meet your criteria to be used as a taxi have rear tinted windows. Example : BYD full EV or Hybrid have darkened windows (probably because they were designed and manufactured in Asia where it's sunnier than here). BYD have now overtaken Tesla in the EV global sales market. They are actually an affordable brand new car unlike Mercedes, Audi, BMW, Skoda, VW, Tesla etc.. Which I hasten to add mostly all of the above have dark rear windows. Manufacturers follow trend, the trend is darkened rear windows! Did you know a lot of these models listed above do not manufacture or sell clear/clearer windows? So in effect TMBC is making it very hard to purchase a vehicle that you would actually license!! The job of maintaining a vehicle that does 3-4 times annual mileage is hard enough without a stupid rule that says you can't use it as a taxi because people can't see in. I think TMBC license committee should go to a taxi show, look at the cars that are being showcased and take your light meters with you, then it might actually occur that there is hardly any choice! And while I have your attention	<p>The current proposal aligns with DfT guidance however it is apparent current design, and manufacturing may be outpacing such guidance.</p> <p>Hackney vehicle colour was not a consideration of this consultation and are generally restricted to White or Silver (so long as the logbook mentions either of those colours they can be any shade of) unless it is a wheelchair accessible vehicle, in which case there are no colour restrictions</p>

	what has happened with my proposal to change the Hackney carriage vehicle colour from Silver/ White to any colour? I have signatures from over 50 Hackney TMBC drivers who agree to the change, was logged with Anthony Garnett, put in the bin I suppose?"	
27	"Most vehicles come with factory rear window tint in the range of approximately 20% to 30%. Previously, the limit was set at 50%, and although it has now been reduced to 30%, this change does not effectively resolve the issue. The majority of vehicles still fall within the 20% to 30% range, meaning many drivers may continue to face compliance difficulties. Instead of a strict 30% threshold, the council should consider allowing a flexible range between 20% to 30%, which better reflects real-world vehicle standards and would enable drivers to register their vehicles without hassle, while remaining aligned with council and DVLA guidelines."	The current proposal aligns with DfT guidance however it is apparent current design, and manufacturing may be outpacing such guidance.
28	"I support the proposed reduction in rear window VLT from 50% to 30%. This seems a sensible and proportionate change. It better reflects the range of modern vehicles available on the market whilst still maintaining appropriate visibility and passenger confidence. In practical terms it should make it easier for proprietors to source suitable vehicles without undermining safety or public confidence."	Agrees with proposal
29	"I support the proposed reduction in rear window VLT from 50% to 30%. This seems a sensible and proportionate change. It better reflects the range of modern vehicles available on the market whilst still maintaining appropriate visibility and passenger confidence. In practical terms it should make it easier for proprietors to source suitable vehicles without undermining safety or public confidence."	Agrees with proposal
30	"I believe 70% VLT front passenger and 30% VLT rear passenger. "	Agrees with proposal
31	"Can stay the current regulation."	Does not propose any changes
32	"Most vehicles come tinted from factory my friend brought a skoda estate from new and was not allowed to work it as they we're slightly darker than you allowed however it was a factory legal tint so I think tint should be suitable as its a legal tint"	The current proposal aligns with DfT guidance however it is apparent current design, and manufacturing may be

		outpacing such guidance
33	"That's fine "	Agrees with proosal
34	Email reply at foot of document	
35	Email reply at foot of document	
<p>The Licensing & Appeals committee approved the use of new door signage for both Hackney Carriage and Private Hire vehicles. The door signs will be displayed on the front doors so that passengers can easily identify the plate number of the vehicle. There will also be a QR code that passengers can scan on their mobile phones to contact the council about the vehicle. The QR code will give them access to a form where they can submit complaints, compliments or report concerns. Here are images of the proposed door signs (subject to final changes and approval).</p> <p>Please provide any comments you have about the introduction of the door signage.</p>		
Respo ndent	Comment	Officers comments and recommendation to Licensing and Appeals Committee
1	"Streamline supports this proposal. "	Agress with proposal
2	"New signage: I think this is totally unnecessary and should be dropped. It will add to further unwarranted stress & harassment from the public to the drivers. The drivers already deal more than enough of such issues from fare dodgers, bigots and drunk heads. I will rather appreciate if the council committee could help organise some extra support from the local police so they can prioritise & respond to our calls made under duress asking for urgent help when being physically attacked by violent customers instead of these new QR-centric signages ."	The design and introduction of this signage has already been agreed in principle to aid the customer experience. Abuse of the QR code to make malicious complaints can be monitored and adjustments made to future iterations should the need arise.
3	"It will just make the car look messy as we are already carrying taxi plate at rear I think there is no need for this"	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that

		currently on display
4	"I think this is totally unnecessary and should be dropped. It will add to further unwarranted stress & harassment from the public to the drivers. The drivers already deal more than enough of such issues from fare dodgers, bigots and drunk heads. I will rather appreciate if the council committee could help organise some extra support from the local police so they can prioritise & respond to our calls made under duress asking for urgent help when being physically attacked by violent customers instead of these new QR-centric signages . "	The design and introduction of this signage has already been agreed in principle to aid the customer experience. Abuse of the QR code to make malicious complaints can be monitored and adjustments made to future iterations should the need arise.
5	"Object I think the sign which we have already they are absolutely fine , just need to add up a QR code on it instead of spending a lot money on new stickers , you can just give QR code stickers to put on doors , ofcourse they will not be as big as these signs you want to introduce , so it will save money and the job will be done as well. Thanks "	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display
6	"I am in favour "	Agrees with proposal
7	"It is inportent to have clear taxi plate number for coustomers and other to make complaints. But the taxi door signs we have ots looks more professional and looks nice as a taxi driver I feel batter to drive around the sign we have at the moment.i think we can make our old design signs little bit bigger and add our unique plate number thank you "	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display
8	"The introduction of door signage for Hackney Carriage and Private Hire vehicles raises several concerns that outweigh its intended benefits. While improving passenger awareness and accountability is important, displaying plate numbers prominently on vehicle doors may create privacy and safety risks for drivers, making them more vulnerable to harassment or misuse of their details. Additionally, the inclusion of a QR code for direct public reporting could encourage frivolous or malicious complaints, placing an unfair administrative burden on both drivers and the council. There is also the question of cost and implementation, as drivers may be required to fund and maintain these signs without clear evidence that they will significantly improve passenger safety. Overall, the proposal risks introducing	Abuse of the QR code to make malicious complaints can be monitored and adjustments made to future iterations should the need arise.

	unnecessary complications and potential harm without a proven, proportionate benefit."	
9	"I agree"	Agrees with proposal
10	"I agree"	Agrees with proposal
11	"I have no issue with this"	Agrees with proposal
12	"I'm in favour"	Agrees with proposal
13	"Waste of time and money"	Partial funding for the initial tranche of door signs has been identified with the remainder to be found from existing budgets. There will be no initial cost to drivers.
14	"Personally, I prefer the previous signs more than the new versions."	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display
15	"This is a good idea"	Agrees with proposal
16	"Fine by me."	Agrees with proposal
17	"I don't agree of the use of door signage.I think is enough information as it is at the moment."	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display
18	"Agree for Hackney Carriage but disagree for private hire vehicles. "	Whilst there are differences between Hackney and Private Hire vehicles, these are not always obvious to the public. The

		signage is designed to confirm the vehicles status as either a Hackney or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display
19	"Not sure this is going to help by the time customer has got their phone out driver has gone"	Whilst the vehicle may be too far away to use the QR code the prominent badge number on the sticker should be sufficient to identify the vehicle.
20	"Ok"	Agrees with proposal
21	"I fully support this."	Agrees with proposal
22	"It's okay but would be better if we do something like TFL do just in windows sign and license. "	The proposed signage is clear and consistent
23	"The door signage is totally unneeded as we have a taxi plate on the rear of the vehicle and a small plate inside. Some drivers might have jobs where a permanent sign would not be appropriate. Ie Doing a funeral. And also a permanent sign would leave shadow marking on the vehicle,which would make it harder to sell on"	The door stickers are designed to confirm the vehicles status as either a Hackney or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display. Vehicles currently registered as plate exempt will also be exempt from displaying these door stickers.
24	"They will make the cars look not professional. Most customers like that the cars are with no side signage "	The door signage has been designed with the customer in mind to make it easier for them to identify the vehicle in question should the need arise
25	"While I support the modernization of the signage, I have concerns regarding the potential misuse of the QR code. There is a risk that this system could be exploited by individuals to file unfounded or biased complaints, including those motivated by discrimination or prejudice. To protect drivers, I suggest that the council implements	Abuse of the QR code to make malicious complaints can be monitored and adjustments made to future iterations should the need arise. Officers always investigate

	a strict verification process for all feedback received through the QR code. It is essential that drivers are not unfairly penalized and have a fair right to respond to any claims before any action is taken. Safeguarding hardworking drivers against malicious reporting should be a priority."	complaints impartially and require a level of evidence to substantiate any claims
26	"For over 25 years, many of our clients have enjoyed an executive feel to their airport transfers with us. When you excluded many models of cars from being plate exempt because they didn't fit the council's "elite list of approved models" we received some negative feedback from our clients as we now had to have the plates on the car inside and out, which of course we adhered too. I believe we will again receive negative feedback from clients if we turn up in a car with the newly proposed insignias on doors. They will feedback that the "exclusive and executive" feel that they once had of travelling to airports in unmarked cars with us has now ended and I worry may jeopardise some bookings. Will there be an exemption opportunity for private hire companies that have this sort of clients to not need the insignias? "	The door stickers are designed to confirm the vehicles status as either a Hackney or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display. Vehicles currently registered as plate exempt will also be exempt from displaying these door stickers.
27	"For Private Hire vehicles, this doesn't seem to be necessary as they are only being used for pre-booked work and customers have already been provided with vehicle's and driver's details. "	
28	"Many drivers use the same vehicle for both private and personal purposes, and requiring stickers on such vehicles is not always practical or preferable. In most cases, the public can already distinguish between private hire and hackney carriage vehicles, making this requirement unnecessary. Therefore, it may be worth reconsidering whether this measure is essential."	The door stickers are designed to confirm the vehicles status as either a Hackney or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display
29	"I support the introduction of the new door signage. Clearer signage, together with plate numbers and QR code access for complaints or compliments, should improve public confidence and make identification easier. I would also ask the Council to consider one further amendment to the wider policy: removing the requirement for Hackney Carriages to be wholly white or wholly silver. Given cross-border hiring and the different vehicle specifications used by neighbouring authorities, colour is no longer a reliable or consistent way for the public to distinguish vehicle types. Hackney Carriages are already readily identifiable by their illuminated roof signs, whereas Private Hire Vehicles are not. With more prominent door signage now also	Agrees with signage proposal. Accepting that this will create a clear definition of the vehicles' status there are no plans to change the colour requirements of Hackney Carriages. Currently standard vehicles can be Silver or White (so long as the logbook mentions those colours they can

	being introduced, the case for retaining a strict Hackney colour restriction is even weaker. The rule is also difficult to justify consistently when some Hackney vehicles are already exempt from the colour restriction. If colour uniformity were truly essential, it would need to apply universally. In practice, vehicle identification is much better achieved through signage, roof signs, plates and enforcement than through colour alone. Removing the restriction would widen the pool of suitable vehicles and improve availability and affordability without undermining public clarity or safety."	be any shade thereof). Alternatively, by vesture of section 8.3 of the policy wheelchair accessible vehicles licensed as Hackneys can be any colour.
30	"I support the introduction of the new door signage. Clearer signage is a more effective and modern way of distinguishing licensed vehicles than relying on indirect features such as vehicle colour. The proposed signs, together with plate numbers and QR code access for complaints or compliments, should improve public confidence and make identification easier. I would also ask the Council to consider one further amendment to the wider policy: removing the requirement for Hackney Carriages to be wholly white or wholly silver. Given the increasing amount of cross-border hiring and the different vehicle specifications used by neighbouring authorities, colour is no longer a reliable or consistent way for the public to distinguish vehicle types. In any event, Hackney Carriages are already readily identifiable by their illuminated roof signs, and Private Hire Vehicles are not. With more prominent door signage now also being introduced, the argument for retaining a strict Hackney colour restriction is even weaker. Removing the colour restriction would widen the pool of suitable vehicles, improve availability and affordability for proprietors, and would not reduce public clarity because vehicle identification is now much better achieved through signage, plates and roof signs than through colour alone."	Agrees with signage proposal. Accepting that this will create a clear definition of the vehicles' status there are no plans to change the colour requirements of Hackney Carriages. Currently standard vehicles can be Silver or White (so long as the logbook mentions those colours they can be any shade thereof). Alternatively, by vesture of section 8.3 of the policy wheelchair accessible vehicles licensed as Hackneys can be any colour.
31	"I think it's not necessary in regard of the door signage. We have got a Tonbridge And Malling door sign."	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display
32	"I do not agree with additional signs on the side doors for private hire vehicles."	The door stickers are designed to confirm the vehicles status as either a Hackey or Private

		hire vehicle and present the vehicles badge number in a more prominent way to that currently on display which is applicable to both types
33	"It think signage on cars are good as people can see who companies are so not needing to approach un-sign written cars "	Agrees with proposal
34	"This is not the right, as these signage looks very big and in future if someone wants to use the car for private use or to put it for sale there will be clear visible difference of colour. If a passenger wants to identify the plate number of the registered vehicle, they can easily see big license plate issued by the council or big sign with the car details in the front. I can't see any difference while using these signs, as it's just another new thing. "	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display. This new signage will supersede existing designs. We have received no complaints that existing signage has impacted on vehicle paintwork.
35	"This need to be magnetic and allow to remove when not working as taxi driver. When we not working in borough and people targeting to us without reason. Some time people See this kind of sign and break the glass for change. Like other council allow to remove door sign when driver not working. Example Medway councils."	The door stickers are designed to confirm the vehicles status as either a Hackey or Private hire vehicle and present the vehicles badge number in a more prominent way to that currently on display. Magnetic type signage may be subject to vandalism and misuse. The council will monitor use of the QR code and whilst abuse is considered unlikely all reasonable adjustments will be considered should a trend of misuse arise.
36	Email reply at foot of document	
<p>We are updating our DBS requirements to make it mandatory for all existing and new applicants (Private Hire, Hackney Carriage & Dual Drivers) to sign on to the DBS Update service. All new applicants will be required to sign up when they are first licensed and existing drivers will be required to sign up on their next renewal. The licensing team will also be introducing six monthly DBS checks on all drivers in line with the Department for Transport best practice guidance.</p>		

More information about the cost and how to sign up can be found on the DBS Update service webpages.		
Please provide any comments you have about the introduction of the mandatory online DBS and checks.		
Respo ndent	Comment	Officers comments and recommendation to Licensing and Appeals Committee
1	"Streamline supports this proposal."	Agrees with proposal
2	"DBS checks: will oppose to the 6 monthly DBS checks, however, am in favour of the update service."	The increase to six monthly checks brings us in line with neighboring authorities and DfT guidance and will not directly result in any additional costs to drivers.
3	"I don't mind "	Agrees with proposal
4	"I will oppose to the 6 monthly DBS checks, however, am in favour of the update service. "	Once signed up to the online service the six-monthly checks will not result in any additional costs. Checks provide confidence and the reason for opposition is unclear.
5	"It will make it easy for everyone, accepted . Thanks "	Agrees with proposal
6	"I agree "	Agrees with proposal
7	"I think this is fine it's eazy for everyone to do it online Thank you "	Agrees with proposal
8	"I agree with this."	Agrees with proposal
9	"I agree "	Agrees with proposal
10	"I agree "	Agrees with proposal
11	"I agree with this"	Agrees with proposal

12	"I'm in favour"	Agrees with proposal
13	"good I have had online for years "	Agrees with proposal
14	"DBS should be on the update service to all Hackney and PH drivers."	Agrees with proposal
15	"Fine by me "	Agrees with proposal
16	"I agree with this."	Agrees with proposal
17	"Agree with subscribing for DBS Update Service."	Agrees with proposal
18	"I'm fine with this"	Agrees with proposal
19	"Agree"	Agrees with proposal
20	"I am in full support of this amendment"	Agrees with proposal
21	"Have no problem with this sign up but it's more expense but what business incentive do we get? Nothing to create more business! More squeeze for drivers. How many more Hackney spots has been created in last decade! "	The online DBS subscription is £16 per year instead of £49.50 every 3 years so represents a small saving in the long term.
22	"I have had this for many years. I think to make this a standard requirement would be beneficial and make the service watertight "	Agrees with proposal
23	"I completely agree with this decision "	Agrees with proposal
24	""I have concerns regarding the enforcement of these new rules. While local drivers are required to meet these high standards (DBS Update Service, new signage, window tints), many drivers licensed by other authorities (like TfL or other councils) operate in our area through apps like Uber without following these same local regulations. How does the council plan to protect local licensed drivers from this unfair competition? If these rules only apply to us and not to 'cross-border' drivers, it puts local businesses at a significant disadvantage.""	The introduction of the six-monthly checks of online DBS's is in line with the DfT guidance, therefore all councils should be carrying these out.

25	"Agreed"	Agrees with proposal
26	"I support the proposal to require drivers to join and maintain the DBS Update Service and for six-monthly DBS checks to be carried out. This appears to be a sensible safeguarding measure and is in line with current best practice. Provided the process is straightforward and clearly explained to drivers, I support the change."	Agrees with proposal
27	"I support the proposal to require drivers to join and maintain the DBS Update Service and for six-monthly DBS checks to be carried out. This appears to be a sensible safeguarding measure and is in line with current best practice. Provided the process is straightforward and clearly explained to drivers, I support the change."	Agrees with proposal
28	"DBS service update it's convenient and quick save time for everybody."	Agrees with proposal
29	"Good practice "	Agrees with proposal
30	"I agree as drivers will be informed when its due to be updated"	Agrees with proposal
31	"I'm already subscribed to DBS service, I'm not sure why council decided to add more checks every six month. Whereas council already increased the renewal prices "	The introduction of the six-monthly checks of online DBS's is in line with the DfT guidance. The checks will be automatically carried out by the licensing team, with no requirement for the driver to attend the offices. We will store the required details (Certificate number, Date of Birth and Surname (which we already hold)).
32	Email reply at foot of document	

As well as the online consultation replies, two emails from the same recipient with attachments were also sent directly to Licensing Services and outlined responses to the online questions. The text of those emails is presented below.

Dear Licensing Team,

Feedback form for draft '**Hackney Carriage and Private Hire Licensing Policy**'

Further to my earlier consultation response, I would like to add a further point for the Council's consideration in relation to the proposed minimum rear window visible light transmission threshold.

When I first responded, I was content with the proposed move from 50% to 30%, on the basis that this appeared to be a sensible and more proportionate approach than the current position. However, having since considered further information provided by members of the trade, I am no longer confident that a 30% threshold would in fact resolve the practical issue facing proprietors when sourcing suitable vehicles.

In particular, I have now seen evidence from a trade member who states that he tested 44 potentially suitable dealer vehicles using a calibrated tint meter, and that only 4 of those 44 would comply with a 30% threshold, with the remaining 40 measuring below 30%. On that account, 11 of those 40 were said to fall between 26.0% and 28.8%, with the remaining 29 between 19% and 25.2%. If that is broadly representative of the current market, it strongly suggests that a 30% threshold may still exclude a very large proportion of modern vehicles fitted with factory privacy glass.

I would also respectfully ask the Council to consider the evidential basis for retaining a minimum rear window VLT requirement on safety grounds. I have seen a survey document summarising responses from police forces in England and Wales which states that no responding force identified a recorded crime in which tinted glass was considered to have been a contributory factor in an offence in a taxi or private hire vehicle, and that across more than 17.5 million recorded crimes none were believed to have been contributed to by tinted glass in a licensed vehicle.

I appreciate that the Department for Transport best-practice guidance refers to a 30% figure for windows rear of the B-pillar, and I understand why the Council may initially view that as a reasonable compromise. However, the relevant GOV.UK guidance also makes clear that licensing authorities are responsible for their own policies, that requirements should be proportionate, and that unduly stringent approaches can unnecessarily restrict the supply of licensed vehicles. I also note the related DfT government response on GOV.UK stating that there were no identified safety concerns from tinted windows of any value, although a 30% figure was recommended in the interests of passenger confidence.

Against that background, I would respectfully ask the Council to reconsider whether a 30% threshold would actually achieve the intended aim of widening vehicle choice and reducing unnecessary expense for proprietors. It may be that the Council should instead consider either:

- 1. permitting factory-fitted rear privacy glass below 30%, while continuing to prohibit aftermarket tint below that level; or*
- 2. adopting a lower threshold for factory-fitted rear windows, such as 20%, if the evidence shows that this would better reflect the modern vehicle market.*

If the Council remains minded to adopt 30%, I would be grateful if it could explain why that figure is considered appropriate in light of the practical trade evidence now being put forward and the apparent lack of evidence that darker rear privacy glass has itself been shown to contribute to offending in licensed vehicles.

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For completeness, I also maintain the point made in my earlier consultation response that the requirement for Hackney Carriages to be wholly white or wholly silver should be reconsidered. In my view, that restriction no longer serves any meaningful practical purpose in light of cross-border working, illuminated taxi roof signs, licence plates, and the proposed introduction of clearer door signage.

For ease of reference, I attach the two principal supporting documents referred to above. I have also seen further contextual material from within the trade regarding the wider practical effect of the current and proposed policy on modern vehicles, although I have not attached that additional document due to file size constraints. The relevant Department for Transport best-practice guidance and government response are also available on GOV.UK.

Sources relied on:

- 1. Department for Transport, Taxi and Private Hire Vehicle Licensing Best Practice Guidance*
- 2. Department for Transport, Taxi and Private Hire Vehicle Best Practice Guidance – Government Response*
- 3. “Tinted Glass – it’s clear!” – survey summary of police force responses on whether tinted glass contributed to offences in taxis/private hire vehicles*
- 4. Terry Hill email/attachment to Licensing and Appeals Committee dated 25 March 2026 regarding tint meter testing of 44 dealer vehicles*

Yours faithfully,

M S

Dear Licensing Team,

Thank you for the opportunity to comment on the proposed revisions to the Hackney Carriage and Private Hire Licensing Policy.

I support the three proposed changes currently under consultation.

First, I support the reduction in rear window VLT from 50% to 30%. This appears to be a sensible and proportionate amendment which should widen the range of vehicles available for licensing without compromising safety or passenger confidence.

Second, I support the introduction of the proposed new door signage. Clearer door signage is a practical and effective way of improving vehicle identification for passengers and members of the public, and the inclusion of plate details and QR-linked reporting is a positive step.

Third, I support the proposed requirement for mandatory DBS Update Service enrolment and six-monthly DBS checks. This appears to be a

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reasonable safeguarding measure in line with current best practice.

In addition to those points, I would strongly ask the Council to consider one further amendment before the revised policy is adopted: the removal of the requirement that Hackney Carriage vehicles must be wholly white or wholly silver.

In my view, the original justification for this restriction no longer stands up in practice. Historically, one of the main arguments has been that the public can distinguish Hackney Carriages from Private Hire Vehicles by colour. However, that assumes a level of consistency that no longer exists. Passengers do not live and travel only within one borough, and because of cross-border hiring the public regularly see licensed vehicles from different neighbouring authorities, all subject to different specifications and appearance requirements. As a result, colour is no longer a reliable or consistent means of distinguishing vehicle types.

In any event, Hackney Carriages are already readily identifiable by their illuminated roof signs, whereas Private Hire Vehicles are not. The Council is now also proposing more prominent front door signage for both Hackney Carriages and Private Hire Vehicles. If the policy objective is public identification, that objective is now much better achieved through door signage, roof signs, plates and badge numbers than by requiring a vehicle to be white or silver.

The present rule is also difficult to justify consistently when some Hackney vehicles are already exempt from the colour restriction. If colour uniformity were truly essential to public identification, the policy would need to apply universally. In reality, the distinction between vehicle types is already maintained far more effectively by signage, roof signs, plates and enforcement.

The current colour restriction also creates a real and unnecessary practical disadvantage for proprietors. It materially reduces the pool of suitable vehicles available on the market. Often, an otherwise ideal vehicle may not be available in white or silver at all, or the limited examples that are available may be more expensive simply because the market is narrower. Removing the restriction would improve vehicle choice, availability and affordability without undermining safety, enforcement or public confidence.

I would also respectfully suggest that the rationale of preventing Private Hire Vehicles from plying for hire has limited force in Tonbridge & Malling compared with some neighbouring authorities. In a borough where Hackney Carriage licences are comparatively accessible, there is far less incentive for anyone seeking Hackney-style work to remain in Private Hire rather than simply licensing a Hackney Carriage properly.

For all of those reasons, I would strongly urge the Council to reconsider the white/silver-only requirement for Hackney Carriages and allow Hackney vehicles to be licensed in any colour.

Yours faithfully,

MS

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An attachment to a survey of responses from Police forces in 2010 as at [Agenda Item 10 03 19663 Item 10 Appx 2 2011 01 03 Tinted glass it's clear! \(survey \(cont\)\).pdf](#) was also supplied