

WILTSHIRE POLICE



XXXXXXX
By email

**Force Disclosure Unit
Police Headquarters**
London Road
DEVIZES
Wiltshire
SN10 2DN

Date 3rd September 2026

Our Ref FOI 2026-684

Dear XXXXX,

I write in connection with your request for information dated 22nd June 2026, concerning vehicle headlight offences. Please accept my apologies for the delay in responding to your request.

I am required by the Freedom of Information Act 2000 to handle all requests in a manner that is blind as to the identity and motives of the requestor. Any information released as a response to a request is regarded as being published and therefore in the public domain without caveat.

Following receipt of your request, research was conducted by the Justice Traffic department at Wiltshire Police. Your request for information has now been considered and I am **not** obliged to supply the information you have requested.

You wrote:

Under the Freedom of Information Act 2000, I am requesting data regarding the enforcement of vehicle lighting offences, specifically focusing on non-compliant, aftermarket, or dazzling headlamps (e.g., retrofitted LED or HID bulbs in halogen housings).

Please could you provide the following information for the last six calendar years (2019, 2020, 2021, 2022, 2023, and 2024) broken down by year:

1. The total number of Traffic Offence Reports (TORs) and Fixed Penalty Notices (FPNs) issued for the following specific CJS offence code:
 - **RL89171**: Use a motor vehicle on a road where the aim of the headlamp beam was used to cause undue dazzle / discomfort.
2. If your electronic recording system allows for a keyword search within the free-text "officer notes" or "offence particulars" field without exceeding the Section 12 cost limit, please provide the number of the above offences (or general lighting offences) where the officer notes contain any of the following keywords:
 - "LED"
 - "HID"
 - "Xenon"

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- "Aftermarket"
- "Retrofit"

3. The total number of Vehicle Defect Rectification Scheme (VDRS) notices or PG9 Prohibition notices issued specifically for non-compliant front headlamps.

Our response:

Section 1(1)(a) of the Freedom of Information Act 2000 (FOIA) requires Wiltshire Police to confirm or deny whether the requested information is held. To establish whether the information is held - namely for question 3 - would in itself exceed the time obligations placed upon the authority to comply (18 hours) and therefore engages section 12(2). The system does not allow for extraction of this information, therefore, to even establish whether the requested information for question 3 is held would exceed our time obligations to comply.

Under the circumstances I am absolutely confident that to locate, retrieve and extract the information you seek would by far exceed the time obligations upon this authority to comply, and in so doing would exceed the fees limits. This is set at £450 calculated at a flat rate of £25 per hour for those work activities comprising of confirming the information is held, locating it, retrieving it and extracting it. Therefore the whole of the request should fall under the exemption of section 12 of the Freedom of Information Act 2000.

Please note:

If one part of the request engages a Section 12 response, the whole request will engage a Section 12 response. The reason being is due to the fact that locating, retrieving and extracting any further information would only add to the already exceeded time obligations.

Forces may use different recording systems, therefore it may be possible some Forces can provide this information where others cannot.

Ordinarily under our Section 16 obligation to provide advice and assistance we would advise you of a way to refine your request to a more manageable level. Due to the difficulties in obtaining the requested information, as outlined above, I cannot think of a way in which this could be achieved.

Although excess cost removes the Forces' obligations under the Freedom of Information Act, as a gesture of goodwill I have supplied information, relative to your request, retrieved or available before it was realised that the fees limit would be exceeded. I trust this is helpful, but it does not affect our legal right to rely on the fees regulations for the remainder of your request. What I can provide you with is documented below:

Please could you provide the following information for the last six calendar years (2019, 2020, 2021, 2022, 2023, and 2024) broken down by year:

1. The total number of Traffic Offence Reports (TORs) and Fixed Penalty Notices (FPNs) issued for the following specific CJS offence code:
 - **RL89171:** Use a motor vehicle on a road where the aim of the headlamp beam was used to cause undue dazzle / discomfort.

Year	Number of Notices Issued
2019	0
2020	0
2021	0

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2022	1
2023	0
2024	3

2. If your electronic recording system allows for a keyword search within the free-text "officer notes" or "offence particulars" field without exceeding the Section 12 cost limit, please provide the number of the above offences (or general lighting offences) where the officer notes contain any of the following keywords:

- "LED"
- "HID"
- "Xenon"
- "Aftermarket"
- "Retrofit"

The relevant system does not allow for these types of searches, therefore we are unable to assist with this question.

Section 17 of the Freedom of Information Act 2000 requires Wiltshire Police, when refusing to provide such information (because the information is exempt) to provide you the applicant with a notice which: (a) states that fact, (b) specifies the exemption in question and (c) states (if that would not otherwise be apparent) why the exemption applies.

The exemption applicable to the information requested is:

Section 12 - Exemption where cost of compliance exceeds appropriate limit

In accordance with section 17 of the Act, this letter represents a Refusal Notice for this particular request.

Please contact me if you would like to discuss the withheld information.

Yours sincerely,

FDU Decision Maker