



Driver and Vehicle Licensing Agency Call for Evidence

Registering historic, classic, rebuilt vehicles
and vehicles converted to electric

Response summary report

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Overview

In 2024, the Driver and Vehicle Licensing Agency (DVLA) and the Department for Transport (DfT) launched a call for evidence to gather views and evidence about the policies that govern the registration of rebuilt, kit-built, kit converted, radically altered, reconstructed classics and vehicles converted to electric.

The call for evidence opened on 9 May 2024 and closed on 4 July 2024 and invited views and evidence on 9 areas:

1. Historic and classic vehicles registration
2. Rebuilt and restored vehicles
3. Kit-built vehicles
4. Radically altered vehicles
5. Vehicles converted to electric propulsion
6. Q and QNI registration numbers
7. The Vehicle Identification Number (VIN)
8. What other countries do
9. Establishing independent advisory groups

Introduction and background to the call for evidence

The law states that every vehicle keeper must notify DVLA of any changes that are made to their vehicle (regardless of the age of the vehicle) which result in the particulars set out in the vehicle registration certificate (V5C) becoming incorrect. This allows for updates to be made to the vehicle record held at DVLA, which are then shown on the V5C and shared with law enforcement partners.

The call for evidence explained the current policies, which have been in place for many years. DVLA wanted to seek expert knowledge about whether these policies need updating, in particular to reflect evolving technologies that support the restoration and rebuilding of vehicles and vehicles that are being converted to electric. The call for evidence also asked for any suggestions based on knowledge and expertise in this area that may assist in improving the registration process for these vehicles.

Overall, 1,371 responses were received, including 1,162 from individuals and 129 from those representing organisations. Those who wished to provide a response were asked to complete an online survey which included 46 questions.

The questions covered:

- background questions, including whether those responding to the call for evidence were doing so on behalf of an organisation, or as an individual – those responding on behalf of an organisation were asked to indicate the type of organisation they were responding on behalf of
- what respondents' views are on the current policies and whether these were still relevant

- whether separate policies are needed for historic and classic vehicles, and vehicles converted to electric
- whether DVLA should consider setting up independent advisory groups to support the registration of historic vehicles
- whether DVLA should consider any best practices from other countries that could be implemented in the UK
- whether the current policy of assigning Q registration numbers to vehicles that have been modified is still relevant

Current process

This section described the current processes in place for making registration decisions. It also included examples of changes that are being made to vehicles and how the rules are applied when DVLA assesses these changes.

Summary of responses

This report contains a summary of the responses received and highlights the main themes arising from the call for evidence. It includes verbatim comments and evidence received from those responding as individuals, and those responding on behalf of organisations.

While there were many responses from individuals, there was a wide variety of experience and expertise amongst those who responded, including vehicle owners' clubs and their governing bodies, manufacturer and restorers.

Not all respondents answered every question, and some submitted general information or an overall summary.

Historic and classic vehicles

Question 3.1

What do you consider to be a historic or classic vehicle? Please provide evidence and reasons to support your views.

We received **1,115** responses to this question.

- 27% (296) – a vehicle aged 40 years or over
- 20% (220) – a vehicle aged 30 years or over
- 18% (201) – a vehicle aged 25 years or over

Other suggestions:

- 5% (52) – old or rare vehicle
- 3% (34) – vehicles no longer in production
- 2% (19) – representative of its time

Question 3.2

If you think there should be a separate registration process for historic and classic vehicles, what would be the right process for these vehicles? Please provide evidence and reasons to support your views.

We received **1,017** responses to this question.

Although there were a number of suggestions made, 49% (500) said the current process should remain, with comments themed as:

- 49% (500) – the current process works well or no need to have a separate registration process
- 7% (75) – keep current system with some improvements
- 7% (69) – believe that the age-related registration numbers should be retained (although there were mixed views on whether or not this should be as part of a separate process)

“I don't see why there should be a separate registration process when the current one works fine. The problem occurs when the original number has been lost and an age related plate is requested and the provenance and originality of the machine is in question. This is currently done with dating certificates from owners clubs etc”.

“I think the current process works generally although requirements for major component changes are overcomplicated. Most/many of the vehicles will have had changes.”

“It is important to maintain the history and provenance of these vehicles, therefore it is imperative they keep the original registration marks etc, to show the age and heritage of these vehicles.”

Question 3.3

If you think there should be a series of registration numbers specifically for historic and classic vehicles, how do you imagine this would work? Please provide evidence and reasons to support your views.

We received **993** responses to this question.

The majority, 86% (854), said that there is no need for a specific series of registration numbers for historic and classic vehicles.

“I think this is already done relatively well – registration numbers should be issued to classic cars in an age-related manner.”

“I don't think this is necessary. The numbers just need to be age-related as currently done.”

Question 3.4

Should there be a new type of safety check in place which takes into account the age of a historic or classic vehicle? If so, please provide evidence and reasons to support your views.

We received **1,083** responses to this question.

36% (394) felt that there is no need for a new type of safety check.

However, the majority of comments suggest that a new type of check is needed. Some of the main ones have been themed as:

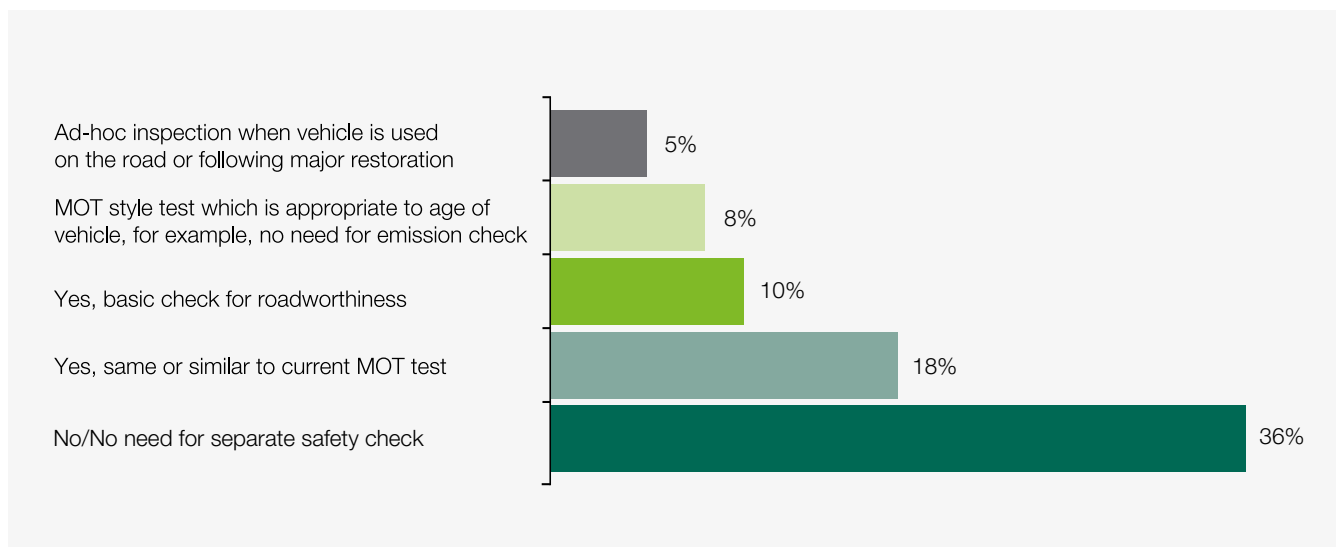
- 18% (196) – yes, same or similar to current MOT test
- 10% (109) – yes, basic check for roadworthiness

- 8% – MOT style test which is appropriate to age of vehicle, for example, no need for a check of emissions
- 5% – ad-hoc inspection when vehicle is used on the road or following major restoration

“Yes an age and status-related ‘sympathetic’ style MOT would be useful, particularly for classic cars that are driven fairly regularly.”

“There should be some form of safety check to ensure vehicle is safe.”

“A one-off safety check following major restoration or repair work would be appropriate. Individual Vehicle Approval is not suitable in this context.”



Question 3.5

Should there be a distinction made between restoration, where an existing registered vehicle with an established history is being refurbished, potentially with some new parts, and vehicles constructed as a replica not based on a registered vehicle, but constructed from a collection of old parts? If so, please provide evidence and reasons to support your views.

We received **1,053** responses to this question.

32% (342) felt that no distinction should be made.

However, the majority of comments suggest that a distinction is needed.

Some of the main ones have been themed as:

- 18% (191) – yes (limited suggestions made)
- 7% – yes, replicas should be registered as new if not based on previously registered vehicle, original chassis or frame
- 6% – yes, replicas should be registered as new or not use old VIN numbers
- 6% – yes, replicas to be subject to safety inspection, IVA or MOT
- 5% – yes, replicas should be issued with a Q registration number

“Where do you draw the line? Is there any reason to change the current system?”

“A replica not based on a registered vehicle, constructed from old parts, should not qualify as a historic vehicle. However, as a significantly modified vehicle, it should be subject to IVA on first registration, much like a kit car.”

“Yes. There is already the Q reg system for vehicles made from parts.”

“Replica vehicles are a class of their own. Many of them are effectively brand new using newly manufactured parts. They are valuable in terms of historic remembrance, but they should not be considered either historic or classic because they are neither.”

Reconstructed classic scheme

Question 3.6

If you think the current guidance is still relevant, please provide evidence and reasons to support your views.

We received **762** responses to this question.

Views were split almost equally here.

40% (306) agreed that the current guidance is still relevant and although not many reasons were provided, the main view was that it does not cause any issues so no need to change things.

However, just under 40% believe that the guidance is no longer relevant and should be updated. Some suggestions for improvement have been themed as:

- 16% (119) – guidance no longer relevant or needs updating in general
- 9% (65) – fails to acknowledge that using some new components is unavoidable
- 3% – have an MOT requirement
- 2% – allow safety modifications

“Current guidance is ok, most of us understand it, why change it?”

“No. Things have moved on in the present classic car movement and continue to do so.”

“The current guidance is still largely relevant but fails to acknowledge that the use of some new components is likely to be unavoidable. For vehicles built with a separate body and chassis it is likely that a newly constructed body will be necessary.”

“The guidance is reasonable, but insistence on paper evidence to prove registration should be relaxed. Minor alterations (lighting, suspension, braking etc) which improve the safety of a car should be accepted.”

“Vehicles should have mot type test upon recommissioning or restoration.”

Question 3.7

What do you think should be the definition of a reconstructed classic vehicle? Please provide evidence and reasons to support your views.

We received **814** responses to this question.

There were various combinations of definitions provided, the main ones being:

- 12% (100) – reconstructed to the same design specification as original vehicle
- 12% (97) – built using all or a majority of period parts
- 10% (79) – original chassis, engine, body or gearbox remaining

“A car which has been built up from mostly original components, from scratch, but long after production for that model finished.”

“Reconstructed with period parts, but allowing upgrades for safety.”

“A reconstructed classic vehicle still retains original or historical parts, such as the chassis and hence the chassis number, but features replacement, altered, or new components such as drivetrain, or power steering, air conditioning etc.”

Question 3.8

If you think it's appropriate to ensure the components used to build a vehicle must be more than 25 years old and within the period the model of vehicle was originally manufactured, please provide evidence and reasons to support your views.

We received **911** responses to this question.

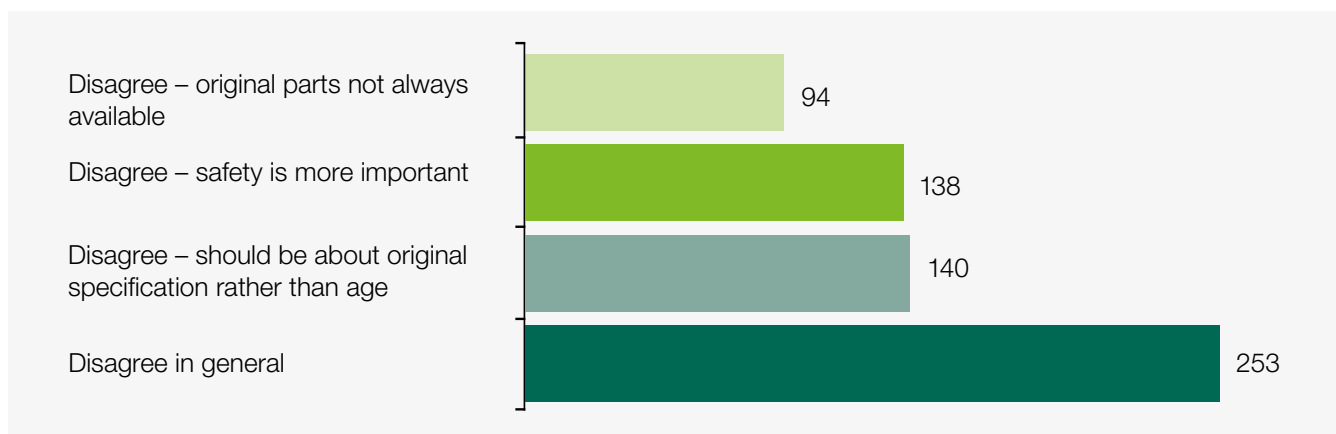
The majority disagree that this is appropriate, the main reasons being:

- 28% (253) – disagree in general (non specific)
- 15% (140) – disagree - should be about original specification rather than age
- 15% (138) – disagree - safety is more important
- 10% (94) – disagree - original parts not always available

“Sometimes, original parts are simply not available and so a remanufacture or close it is used. It may not change the appearance or function of the vehicle but be of the same functionality.”

“No. Newly made to original or better components allowed where they increase safety, brakes, brake lines, disc brakes replacing drum brakes, abs additions, fuel cutoffs and fuel tanks.”

“The specification is more important than the age. New components are fine.”



Question 3.9

Do you think the reconstructed classic scheme should be specific to vehicles not previously registered, or should the scheme also apply to already registered vehicles that have been rebuilt or restored? Please provide evidence and reasons to support your views.

The following shows the results from the 3 options provided to respondents, with the top 3 themes for each:

507 (50.5%) Specific to vehicles not previously registered (with 346 respondents adding a comment).

- 27% (95) – registered vehicles have a traceable history that should remain with the vehicle
- 15% (51) – unfair to apply retrospectively
- 11% (38) – restored vehicles are not the same as newly reconstructed vehicles

“Should only apply to vehicles not previously registered, as any work on an existing vehicle that is registered would fall into other categories.”

“There is no need to include already registered vehicles, they’re already registered!”

“A vehicle that has been already registered is not reconstructed. There should be reasonable understanding that restoring a vehicle can often require the majority of the parts removing and then reattaching as part of the refurbishment process. Reconstructed should only relate to previously unregistered vehicles.”

241 (24.0%) Also apply to already registered vehicles that have been rebuilt or restored (with 155 respondents adding a comment).

- 30% (46) – need to protect the classic car industry
- 14% (22) – all vehicles should be inspected
- 10% (15) – for safety reasons

“There should be flexibility to allow the recreation of existing vehicles using parts from other cars or totally new parts as necessary.”

“An examination of any restored or reconstructed vehicle is a good idea.”

“Parts are subject to wear and need replacing. A re manufactured part to original specifications with perhaps an improved safety factor should be permitted.”

256 (25.5%) Not sure (with 76 respondents adding a comment).

- 24% (18) – no need for reconstruction classification/scheme
- 9% (7) – identity of an unregistered vehicle may not be known
- 7% (5) – difficult to determine or enforce

“The scheme should be scrapped. It takes away people's basic human rights to express themselves through their vehicles. Vehicles have been modified right from the birth of the automobile.”

“You need to be careful to avoid just reconstructing from a pure identity, it has to be from some ‘reasonable’ physical vehicle of whatever condition.”

A further 42 respondents who did not choose any of these options provided comments, the main one being:

- 55% (23) – no need for reconstruction classification or scheme

Question 3.10

What do you consider to be a replica vehicle as opposed to a reconstructed classic or historic vehicle? Please provide evidence and reasons to support your views.

We received **929** responses to this question.

The main distinctions between a replica as opposed to a reconstructed classic are considered as:

- 25% (230) – looks like an original but with different major components such as the chassis, bodywork or engine

- 24% (225) – replica looks like an original but is built mainly, or all from, new parts
- 14% (130) – replica is an imitation or copy of an original vehicle, usually with no history

“A replica is one where some of the main components are not authentic to that model or period.”

“A replica vehicle looks like the original but the parts will be different.”

Rebuilt vehicles

Question 3.11

What do you think should be the definition of a rebuilt vehicle? Please provide evidence and reasons to support your views.

We received **899** responses to this question.

Apart from the 8% (76) that said no definition is needed, suggestions included:

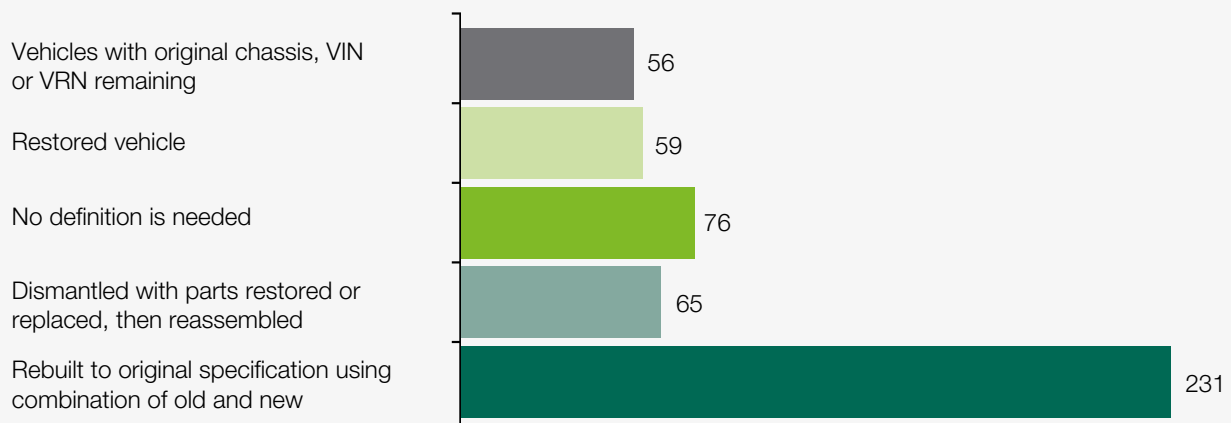
- 26% (231) – rebuilt to original specification using combination of old and new parts
- 7% (65) – dismantled with parts restored or replaced, then reassembled
- 7% (59) – restored vehicle
- 6% (56) – with original chassis, VIN or VRN remaining

“One rebuilt from an original existing car.”

“Rebuilt using the original frame and as many of the original parts or period replacement parts.”

“A car which has been used but has been taken completely apart and put back together almost like new.”

“A rebuilt vehicle uses the chassis and body panels from the original vehicle. The chassis would carry the original VIN.”



Question 3.12

Do you think the current guidance is still relevant? For example, does it take into account emerging technologies and innovation. If so, please provide evidence and reasons to support your views.

We received **879** responses to this question.

There are mixed views on whether the current guidance is still relevant. A number of suggestions were made for improvement:

- 12% (102) – current guidance okay but needs updating, for example, for electric vehicle conversions
- 11% (96) – too restrictive, for example, makes it difficult to keep original identity and registration number
- 9% (76) – electric conversions should not be classed as rebuilt classic or historic vehicles
- 8% (72) – should allow for additional modifications, for example, improves safety and reliability

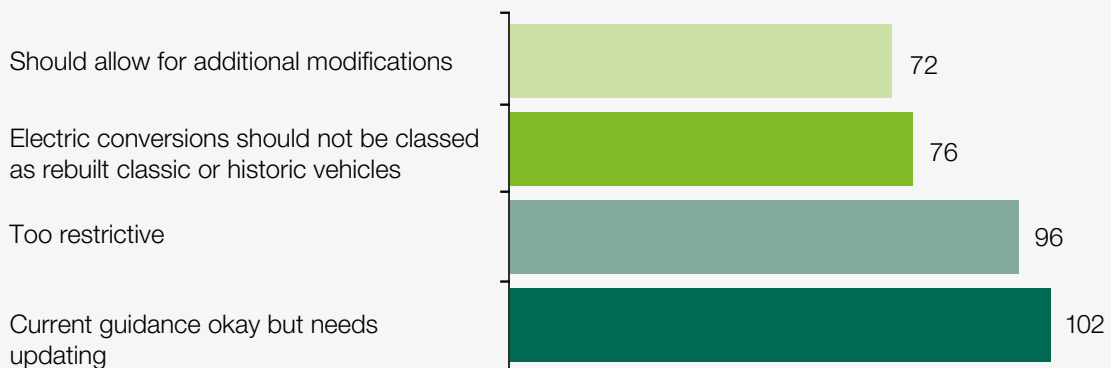
“Current guidance doesn't need replacing but with anything tweaks rather than a rewrite.”

“Electric conversions need a completely separate category. They are no longer classic cars.”

“The guidance is incorrect as restoring or lightly modifying a vehicle does not change what it is.”

“If improvements in safety and reliability are available they should be permitted for classics.”

Relevance of current guidance



Question 3.13

If you think there should be separate rebuilt policies for different vehicle types (motorcycles, cars, vans, etc), please provide evidence and reasons to support your views.

We received **781** responses to this question.

The majority, 69% (536) believe there should not be separate policies.

For those in favour of separate policies, themes include:

- 5% (39) – yes or all different
- 3% (26) – yes, separate only for motorcycles
- 2% (16) – current guidance needs to be reviewed or made clearer

“No. Unnecessarily complicated.”

“Yes, motorcycles are different to 4 wheeled vehicles, a motorcycle after an incident may need a new frame, but should still be classed as the original motorcycle, even with the new frame, this does not seem to happen now.”

Question 3.14

**To what extent should a vehicle be rebuilt before DVLA needs to be informed?
Please provide evidence and reasons to support your views.**

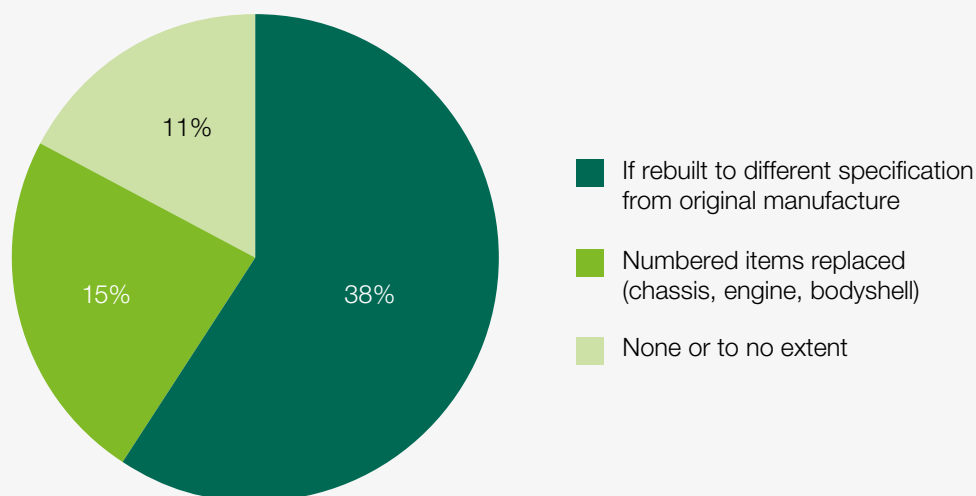
We received **912** responses to this question.

- 38% (349) – if rebuilt to different specification from original manufacture
- 15% (140) – numbered items replaced (chassis, engine, bodyshell)
- 11% (97) – none or to no extent

“The appearance and functionality of the vehicle should retain a close resemblance to the original, else DVLA should be informed.”

“New chassis, repaired original is fine as is.”

“DVLA should never need informing if the vehicle is already registered. The car does not substantially change during a rebuild.”



Question 3.15

Is putting the main emphasis for assessing a rebuilt vehicle on modifications to the chassis or monocoque bodyshell (or frame for motorcycles) still appropriate? If not, what else should be considered? Please provide evidence and reasons to support your views.

The following shows the responses from the 3 options provided to respondents, with the top 3 themes for each:

486 (48.6%) Yes (with 112 respondents adding a comment).

Apart from the 31% (35) that believe it still appropriate, other considerations include:

- 24% (27) – powertrain changes (engine, transmission, propulsion, and so on)
- 8% (9) – anything safety related
- 6% (7) – if it changes the original appearance of the vehicle

“Modifications to suspension and propulsion should also be taken into account as some people do abuse the existing system of not having to have an MOT.”

“But allowing for anything which will improve safety as long as the ‘classic appearance’ is maintained.”

“I believe that only if a modification alters the vehicle in design or appearance, should there be any problem.”

328 (32.8%) No (with 273 respondents adding a comment).

Other considerations include:

- 22% (60) – chassis or monocoque repairs or like for like, to improve strength and safety should be allowed
- 22% (59) – powertrain changes (engine, transmission, propulsion, and so on)
- 9% (25) – modifications in keeping with the vehicle’s history should not change the identity

“100% not the correct way. If anything with a rebuilt vehicle, the engine and other components are just as important as the chassis/monocoque. Matching numbers should also be taken into consideration.”

“Too much emphasis is on the chassis – this should be able to be renewed without changing the registration, like modern cars.”

186 (18.6%) Not sure (with 68 respondents adding a comment).

- 24% (16) – chassis or monocoque repairs or like for like, to improve strength and safety should be allowed
- 13% (9) – powertrain changes (engine, transmission, propulsion, and so on)
- 9% (6) – depends on standard of components used or quality of work

“It should be emphasised that alterations to a chassis or shell should only matter if they are design alterations. If for example part of a chassis has rusted and been effectively repaired, it should not be considered altered.”

“This depends very much on what is actually being done, rebuilding a Land Rover onto a new chassis should be acceptable, as it is far safer to do this than a poorly repaired old chassis.”

A further 23 respondents did not choose any of the options but provided comments, with the main consideration being ‘Powertrain changes’ (engine, transmission, propulsion, and so on).

Question 3.16

At what point should a chassis or monocoque bodyshell modification (or frame for motorcycles) affect the identity of a vehicle that has been rebuilt? Please provide evidence and reasons to support your views.

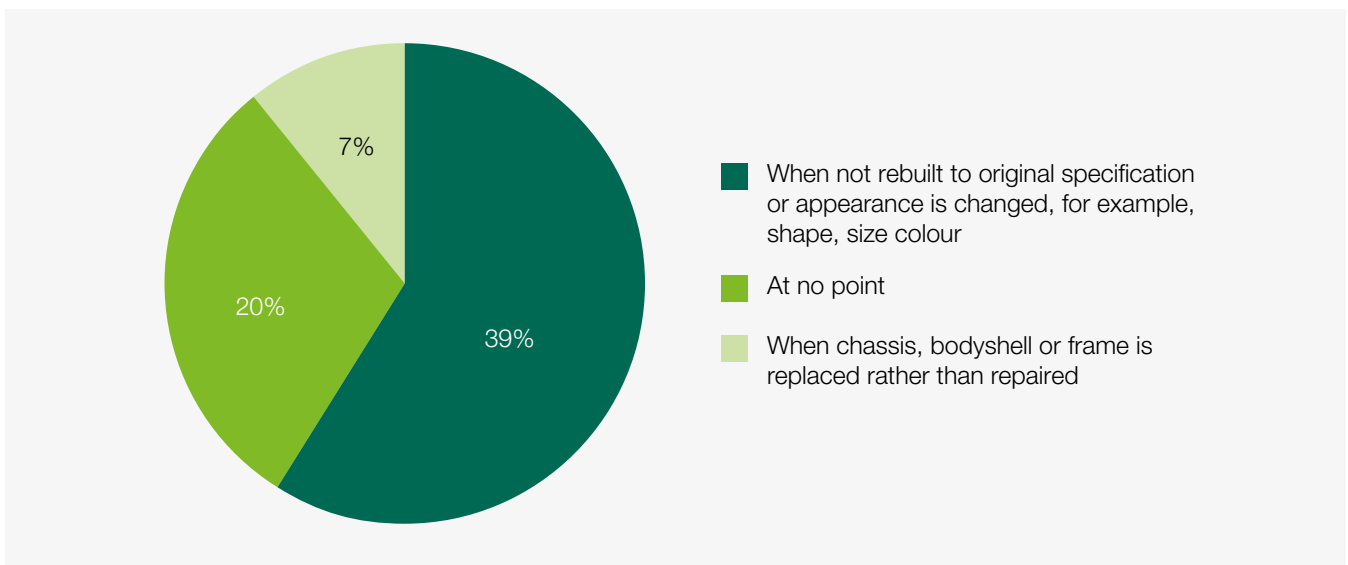
We received **850** responses to this question.

- 39% (332) – when not rebuilt to original specification or appearance is changed, for example, shape, size colour
- 20% (167) – at no point
- 7% (58) – when chassis, bodyshell or frame is replaced rather than repaired

“It’s appearance if the vehicle looks the same no problem.”

“At no point, providing the vehicle is fundamentally the same or can be identified as such by an average person.”

“The identity should only be affected if a new body shell or frame is fitted.”



Question 3.17

If you consider it important for a consumer purchasing a vehicle to know if it’s had major rebuild or restoration work done to it, please provide evidence and reasons to support your views.

We received **890** responses to this question.

49% (440) consider it important, with the main theme being that the documentation or history of the vehicle should be made available to the buyer.

48% (430) do not consider it important, with reasons including:

- 16% (146) – buyer’s responsibility to check
- 12% (108) – not important (non-specific)
- 7% (65) – any modifications should be obvious to an enthusiast

“It is important to understand the condition and history of a vehicle, all major work should be documented and that information given to the customer. This is a commercial matter

and not one that would involve the DVLA.”

“No, it’s the buyers responsibility to make sure they happy with the history and any work carried out on the vehicle.”

“People buying a classic vehicle will know if it has had a rebuild or not.”

Restored vehicles

Question 3.18

Do you think restored vehicles should continue to be assessed according to the current policy for rebuilt vehicles or should there be a specific process for assessing restored vehicles? Please provide evidence and reasons to support your views.

The following shows the results from the 3 options provided to respondents, with the top 3 themes for each:

508 (51.2%) Continue to be assessed according to the current policy for rebuilt vehicles (with 261 respondents adding a comment).

Apart from saying that there is no need for change, 63% (164), other themes include:

- 6% (15) – restored and rebuilt should be a single category to avoid confusion
- 5% (14) – MOTs to be carried out following restoration

264 (26.6%) There should be a specific process for assessing restored vehicles (with 209 respondents adding a comment).

Themes include:

- 15% (32) – restored vehicles are not the same as rebuilt
- 13% (27) – independent assessment or inspection by specialist needed
- 11% (23) – MOTs to be carried out following restoration

220 (22.2%) Not sure (with 94 respondents adding a comment).

Apart from 17% (16) who said they are not sure or familiar with the current policy, other themes include:

- 17% (16) – no need for specific inspection or test for restored vehicles
- 16% (15) – MOTs to be carried out following restoration
- 12% (11) – DVLA should not intervene

A further 37 respondents did not choose any of the options provided but added comments, with themes similar to above.

Question 3.19

What do you think should be the definition of a restored vehicle? Please provide evidence and reasons to support your views.

We received **826** responses to this question.

Apart from 15% (122) who said that no separate definition is needed, main suggestions are:

- 25% (207) – restored to original standard or appearance
- 14% (114) – restored using as many original parts as possible
- 5% (45) – restored as original, with modern safety features

“A restored vehicle is one that has been taken apart and restored back to the original condition.”

“Restored using a combination of existing refurbished, new old stock and reproduction parts with appropriate modifications.”

“A vehicle rebuild to the concept of the original vehicle but including modern updates for reliability, safety or emissions.”

Question 3.20

If you think there should be separate policies for different vehicle types (motorcycles, cars, vans, etc), please provide evidence and reasons to support your views.

We received **681** responses to this question.

Apart from 76% (520) who think no separate policy is needed, other views include:

- 8% (57) – yes or all different so need their own policies
- 3% (22) – separate policy for motorcycles
- 2% (13) – no, but consider different approach for commercial or agricultural vehicles

“No. A restored vehicle is just that. It doesn't matter if it's a motorbike or a bus. It's had money, and a lavish attention for detail, and probably love poured in to it.”

“Different vehicles have different uses and purposes. Each type of vehicle should be assessed on its use.”

“Motorcycles are very much easier to restore and maintain than other vehicles. Components are easy to access and replace.”

Question 3.21

At what point should a chassis or monocoque bodyshell modification (or frame for motorcycles) affect the identity of a vehicle that has been restored? Please provide evidence and reasons to support your views.

We received **761** responses to this question.

Apart from 15% (117) who do not agree that such modifications should affect the identity, there were a number of different views given, including:

- 28% (215) – when appearance or function is changed, for example, shape or size, use of vehicle
- 8% (61) – when chassis, bodyshell or frame is replaced rather than repaired
- 7% (49) – only when significant or major changes made to the vehicle

“When it changes the appearance or functions of that which was original but must be significant (not just something like adding a spoiler or fitting mirror that it never had before).”
“Only if replaced. Repair to the same standard should not affect identity.”
“Major change to chassis or frame.”

Question 3.22

If you consider it important for a consumer purchasing a vehicle to know if it’s had major restoration work done to it, please provide evidence and reasons to support your views.

We received **730** responses to this question.

43% (314) consider it important, with the main theme being that the documentation or history of the vehicle should be made available to the buyer.

55% (403) do not consider it important, with reasons including:

- 16% (115) – buyer’s responsibility to check
- 13% (93) – any modifications should be obvious to an enthusiast
- 8% (59) – DVLA should not be involved, leave it to the seller and purchaser

“Only where significant changes have occurred, eg replacement of a chassis or bodyshell.”

“Buyer’s responsibility to make his her own checks that they are happy to purchase.”

“In my professional opinion, this is not really necessary. It would be up to the consumer to verify for themselves in this case, since if the vehicle is ‘restored’ rather than ‘rebuilt’ then the identity should not be in question, and thus beyond the DVLA’s reasonable scope of operation.”

Kit-built and kit converted vehicles

Question 3.23

If you think the current guidance is still relevant, please provide evidence and reasons to support your views.

We received **680** responses to this question.

43% (292) agree that the current guidance is still relevant and although not many reasons were provided, the main view is that it is a small sector that does not need further regulation.

Some suggestions for improvements have been themed as:

- 5% (36) – make changes to the testing, build or usage of the vehicles
- 5% (36) – legislation should be less strict or be fairer
- 3% (23) – have separate legislation for rebuilds and kit cars

“There is no evidence that the current guidance is no longer relevant. Therefore, it should remain.”

“This needs simplification, it's far too complicated and doesn't allow enough reconditioned major parts rather than new.”

“Kit-built or converted should require inspection (as currently SVA).”

Question 3.24

If you think reconditioned or remanufactured components should be considered the same as brand new components, please provide evidence and reasons to support your views.

We received **764** responses to this question.

71% (540) believe that reconditioned or remanufactured components should be considered the same as those that are brand new. The main view is that they are often better quality than new components.

Of the 16% who do not agree, few reasons were provided although some feel that new components will be safer.

“Provided manufactured to the same (or safety-improved) standards, it should not matter.”

“Reconditioned and remanufactured components should not be considered as new but as pure replacement parts.”

Question 3.25

Should reconditioned or remanufactured components be assessed to ensure they meet the specifications to be used on a different vehicle from the one they were designed for? If so, please provide evidence and reasons to support your views.

We received **756** responses to this question.

47% (351) feel assessment is not needed or not practical.

Of those that gave a reason in favour of assessment, comments have been themed as:

- 29% (222) – yes (can also include the listing of part specifics, circumstances, testing, safety or source)
- “No it's not necessary they are no different to new parts.”
- “Yes, these parts must meet the same specification, performance and tolerances as the original part.”

Question 3.26

If you think kit-built vehicles should be registered as new vehicles if they have more than one reconditioned or remanufactured component, please provide evidence and reasons to support your views.

We received **725** responses to this question.

46% (331) feel that no changes are required.

Of those that think kit-built vehicles should be registered as new, reasons include:

- 32% (234) – yes (they are new builds or should be tested for safety)
- 4% (29) – should have separate legislation for kit cars or Q registration number

“No, kit-built vehicle should never be registered as new vehicles where they use reconditioned parts. This will cause confusion in the marketplace and enable the passing off of new vehicles where they are actually based on old reconditioned parts.”

“Yes they should be classed as new, the majority of reconditioned or remanufactured parts are made to the same standards or better than the originals.”

“Kit vehicles by their nature are a combination of many manufacturers’ parts of different ages and designs melded together. As such how the vehicle behaves on the road and its

safety aspect need to be carefully tested. As the car is from many sources it has no identity and should be considered a new vehicle.”

Question 3.27

If you think the V5C should indicate that the vehicle has been built using reconditioned or remanufactured components, please provide evidence and reasons to support your views.

We received **737** responses to this question.

58% (428) do not think this necessary.

Of those that believe the V5C should indicate this, the main reason for 26% (192), is that it should indicate in whole or in part (mainly to inform potential buyers).

“No, if they are to the original design spec.”

“This is not necessary. There is no in shame in buying spares from a car breakers/ dismantlers. An excellent source of parts. It would also make unnecessary admin for DVLA.”

“It could be shown on the V5. This would encourage the buyer to check which parts etc.”

Question 3.28

If you think that it is important for evidence to be provided to show where reconditioned or remanufactured parts are sourced from, please provide evidence and reasons to support your views.

We received **711** responses to this question.

58% (413) do not think it important for evidence to be provided showing where the parts are sourced from.

Of the 21% (152) that think this evidence should be provided, it was suggested that evidence could also include the listing of part specifics, or shown on sale receipts.

“No, not really necessary, a knowledgeable owner or prospective purchaser will be able to use their own judgement and knowledge.”

“This should form part of the bill of sale.”

“Yes, as substandard parts can be sourced from crashed vehicles which may look ok but have undergone stresses that cannot be seen by just looking.”

Radically altered vehicles

Question 3.29

What do you think should be the definition of a radically altered vehicle and why? Please provide evidence and reasons to support your views.

We received **840** responses to this question.

- 67% (563) – think that the definition should be any major change in original components or resemblance (for example, engine or transmission performance, or body or frame)
- 11% (90) – think that the current definition is sufficient, or that the onus should be on a third party to decide, for example, the buyer or driver, or a qualified technician

“A vehicle that has had its chassis shortened/lengthened or strengthened for additional weight. Or its appearance is significantly different from the original.”

“A vehicle that is drastically different from how it would have left the factory.”

Question 3.30

If you think the current guidance is still relevant, please provide evidence and reasons to support your views.

We received **598** responses to this question.

- 35% (212) – think that the current guidance is still relevant
- 23% (136) – think that the guidance needs updating to include new or evolving methods, technologies, vehicle types, enforcement and so on
- 9% (53) – think that the current guidance is not relevant or is too complex

A further 31% (185) are unsure of the guidance or gave no relevant response.

“I feel the current guidelines are perfectly acceptable.”

“The term ‘radically altered’ should only apply to vehicles so drastically altered that the original historic vehicle has ceased to be. The point at which that line is crossed should be decided by a (V765) stakeholder group of experts alongside DVSA and DVLA. The current points system is not fit for purpose.”

“The current guidance needs updating to encompass new technologies, processes and materials.”

Question 3.31

To what extent should a vehicle be radically altered before DVLA needs to be informed? Please provide evidence and reasons to support your views.

We received **781** responses to this question.

- 50% (392) – DVLA should be informed of any changes to the original components, vehicle class or resemblance (for example, engine or transmission performance, or body or frame)
- 12% (96) – DVLA should be informed of any changes that no longer align with the information on the V5C

A further 26% (200) gave no relevant response or feel that DVLA does not need to be notified.

“Structural and significant aerodynamic modifications should require the vehicle to undergo an inspection as a VOSA test centre to ensure that they are road worthy and the modifications have not reduced the safety of the original vehicle that could compromise the safety of the user, future users or other road users/public.”

“The current system and criteria for notifying the DVLA are reasonable. The re-registration requirements and testing is disproportionate and not fit for purpose.”

Question 3.32

Should the main emphasis for assessing a radically altered vehicle be around modifications to the chassis or monocoque bodyshell (or frame for motorcycles) or should other components also be considered? If so, please provide evidence and reasons to support your views.

We received **763** responses to this question.

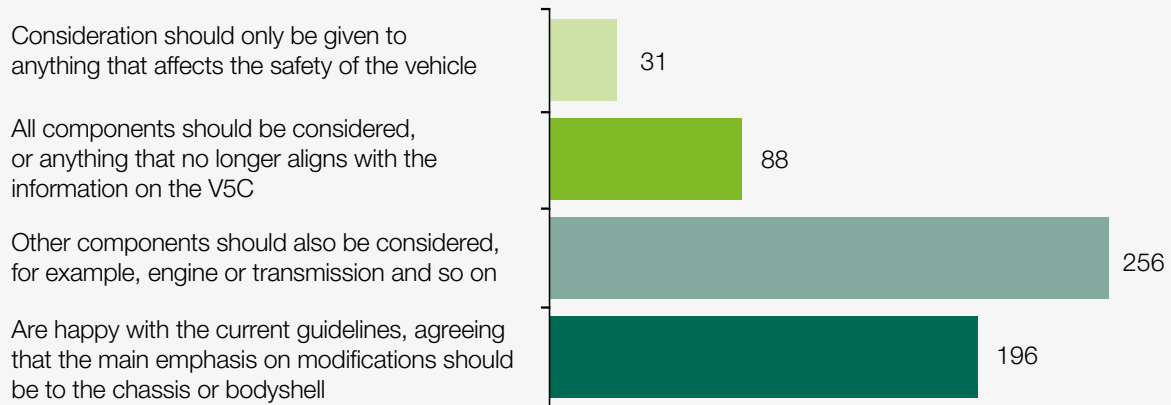
25% (196) are content with the current guidelines, agreeing that the main emphasis on modifications should be to the chassis or bodyshell.

Suggestions for including other components are:

- 34% (256) – other components should also be considered, for example, engine or transmission and so on
- 11% (88) – all components should be considered, or anything that no longer aligns with the information on the V5C
- 4% (31) – consideration should only be given to anything that affects the safety of the vehicle

“Brakes, suspension and steering must also be part of any assessment. Stretch limos will be heavier, and have a greater payload. Safety critical components must be up to the job.”

“Main emphasis should be based on whether the alterations affect the vehicle performance or safety.”



Vehicles converted to electric propulsion

Question 3.33

If you think there should be a separate, specific policy for assessing vehicles that have been converted to electric, what would that policy or process look like? Please provide evidence and reasons to support your views.

We received **841** responses to this question.

The majority favour a separate policy, with suggestions for the process including:

- 18% (155) – a safety assessment or inspection to be carried out on the vehicle to ensure the conversion has been carried out properly
- 13% (109) – agree (non-specific)
- 5% (46) – the weight of the battery should be assessed against that of the vehicle and upgrades made if needed

“Should be a safety test to ensure the conversion has been carried out safely.”

“Yes. It should assess the weight of batteries and motors and the effect on the chassis and handling characteristics.”

“ICE vehicles that are converted to electric require a separate policy as the whole vehicle is subjected to unknown stresses and strains...”

Question 3.34

If you think there should be specific safety tests for vehicles which have been converted to electric, what should these tests involve? Please provide evidence and reasons to support your views.

We received **775** responses to this question.

Suggestions include:

- 18% (137) – battery or electrical wiring safety checks
- 13% (99) – testing to ensure that the vehicle can handle the additional weight
- 12% (95) – annual MOT test suitable for electric vehicles (EVs)

“There should be a testing policy based on the electrical safety/integrity of the electrical system installed, and any impact the additional weight of the electrical system has on the overall braking efficiency of the vehicle. I base this on the potential hazard of high voltage battery systems, the fire hazards, and on the risk to mechanics working on these vehicles in the future.”

“Yes. Vehicles converted to electric should have to undergo an electrical safety check, carried out by an authorised body. This should include an MOT but focus on the safety of the electrification work. Orange cables should be mandatory for all high voltage applications to ensure the safety of persons carrying out subsequent work and responders to emergencies.”

Question 3.35

At what point should a chassis or monocoque bodyshell modification (or frame for motorcycles) affect the identity of the vehicle that has been converted to electric? Please provide evidence and reasons to support your views.

We received **715** responses to this question.

Suggestions include:

- 28% (197) – at the time of the conversion
- 21% (147) – when the chassis or monocoque is significantly altered
- 5% (39) – when the weight of the vehicle exceeds the original design or weakens the structure

“As soon as it is converted, from that point it is a totally different vehicle and should undergo radical testing of its suitability for road use. This is because the massive weight of batteries substantially alters the original designer’s weight distribution and handling qualities.”

“You should be able to switch from ICE to electric propulsion without affecting the identity as long as the vehicle has the original chassis, frame or monocoque.”

Q and QNI registration numbers

Question 3.36

If you consider that a Q registration number should only be assigned to vehicles where the identity is unknown or cannot be determined, please provide evidence and reasons to support your views.

We received **726** responses to this question.

- 32% (231) think that the current process is sufficient and should remain in place
- 22% (160) think that Q plates should only be assigned when the identity of the vehicle cannot be determined, or it has no previous identity
- 5% (36) think that the process works well for kit cars and a further 3% (22) that it provides clarity for potential purchasers

For those that do not agree with the current system, there were a variety of comments about why they feel the Q registration number system does not work. The main themes are that they are unfair or devalue vehicles, an age-related registration number should be assigned as an alternative or that Q numbers should only be assigned when all other options have been exhausted.

“A Q plate is understood for being a vehicle with undocumented history. Buyer beware! Keep the system. It works.”

“Q plates are for unknown vehicles, not for cars that have been registered correctly in year of manufacture.”

“A genuine vehicle, whether restored to a standard specification, or for competition. Yes, a Q plate was always where a cars identity could not be established. In my view this has not changed, but I have heard that some classic cars have recently been issued Q plates as their engine has changed to electric, or similar. This is very wrong and a miss-use of a Q plate, as the vehicle that has been changed still has a clear identity and age.”

“Q registration should not be assigned until all alternatives have been exhausted. If this is not the case, then the historic significance of a vehicle may be lost irrevocably.”

“Only if there is no other choice, as in nobody can thoroughly determine the identity. However, if evidence should arise in the future to determine the vehicle’s identity, you should be given the option to present it to DVLA and change it.”

Question 3.37

Currently, any modification to the chassis or monocoque bodyshell (or frame for motorcycles) will result in a Q registration number being assigned to the vehicle. Do you agree with this policy? If not, to what extent do you consider it acceptable for a vehicle to be modified before it’s assigned a Q registration number? Please provide evidence and reasons to support your views.

224 (22.3%) Yes – agree with this policy (with 30 respondents adding a comment).

- 37% (11) – depends on the extent of the modification
- 27% (8) – only if modifications do not meet original manufacturer’s specifications

“Radical design change from original.”

“Alterations to the body shape, engine general appearance.”

672 (66.9%) No – do not agree with this policy (with 561 respondents adding a comment).

- 42% (238) – depends on the extent of the modification
- 10% (58) – Q plates should be abolished
- 10% (57) – only if modifications do not meet original manufacturer’s specifications

“A Q registration is appropriate when there is no significant part of an original vehicle fitted or the age of the original vehicle cannot be shown.”

“Q should be scrapped and age related registration be used.”

“Only where the vehicle cannot be recognised as the original vehicle.”

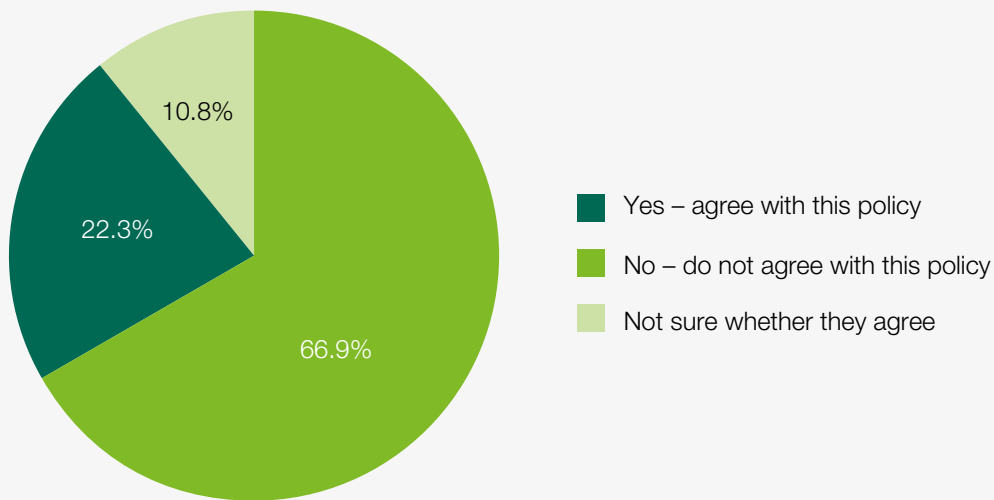
108 (10.8%) Not sure whether they agree (with 27 respondents adding a comment).

- 41% (11) – depends on the extent of the modification
- 26% (7) – only if modifications do not meet original manufacturer’s specifications

“As long as it retains original dimensions etc while retaining the original chassis/monocoque.”

“Again I am against any modification away from manufacturer’s specification. Such modification should not be encouraged, but do not feel a Q registration is the answer, or punishment before other considerations are explored.”

12 respondents did not choose an option, but provided a comment, where the majority said that it depends on the extent of modification.



Question 3.38

If you consider it important for a consumer purchasing a vehicle to know if it's been modified, please provide evidence and reasons to support your views.

We received **710** responses to this question.

Around 50% (354) consider it important, the main reason being that a full disclosure is required so that the purchaser is aware of what they are buying.

43% (302) do not consider it important, the main reason being that it is the buyer's own responsibility to check.

"Yes, so that the new owner can determine the possible safety and historical/originality implications."

"It is important for anyone purchasing any consumer product to know what they are buying. Total disclosure required."

"No. No different to buying anything else. Most classic car buyers look for quality modifications to make a car more reliable and usable on modern road conditions."

"Not necessary. This is a matter between the buyer and seller and the courts."

Question 3.39

Should historic and classic vehicles that have been rebuilt or restored be assigned an alternative age-related registration number instead of a Q registration number? If so, please provide evidence and reasons to support your views.

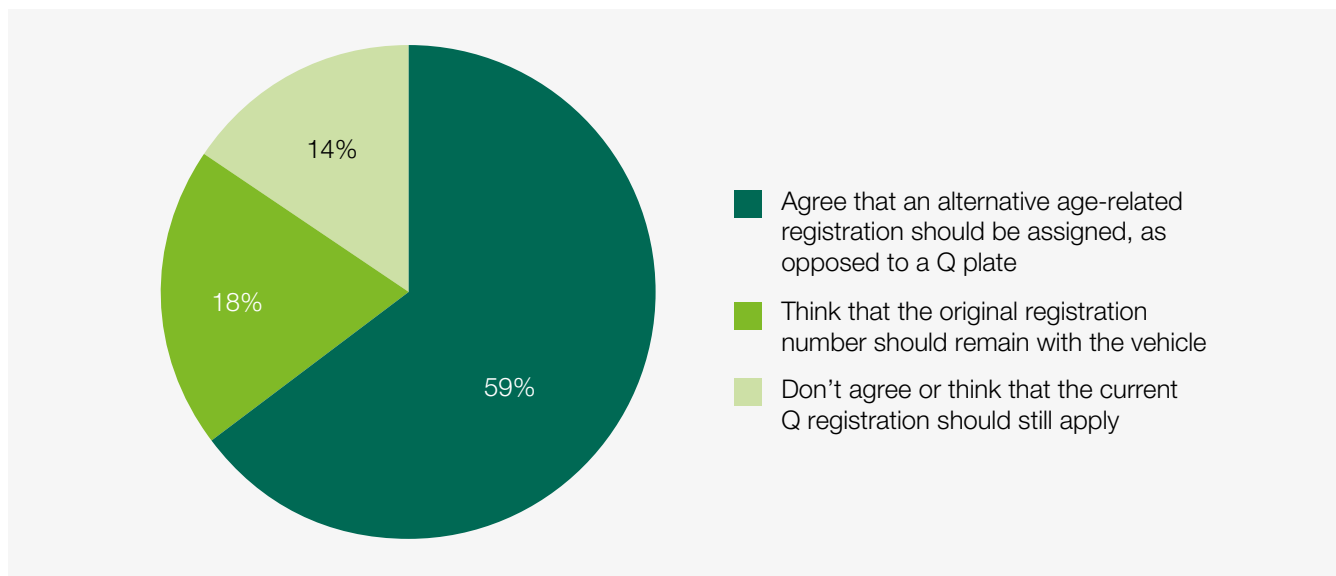
We received **876** responses to this question.

- 59% (520) – agree that an alternative age-related registration should be assigned, as opposed to a Q number
- 18% (156) – think that the original registration number should remain with the vehicle
- 14% (120) – do not agree or think that the current Q registration policy should still apply

"No. Where possible an 'age related' number should be allocated where it is established that the vehicle is essentially the same as that originally registered."

“Yes. This falls within expected spares/repairs/maintenance/general modification expected of any machine, especially vehicles. I see few reasons to have to shift from an original registration to Q plates.”

“No car should be given a Q registration. Only vehicles without an evidenced continuous history should be assigned an age related number.”



The Vehicle Identification Number (VIN)

Question 3.40

In what circumstances do you think DVLA should allocate a VIN? Please provide evidence and reasons to support your views.

We received **793** responses to this question.

More than 50% gave relevant comments as to when a VIN should be allocated by DVLA, including:

- 18% (141) – when the original identity or origin is unknown
- 11% (86) – when the original VIN is lost or no longer visible
- 8% (62) – to brand new vehicles only
- 4% (31) – to kit cars only

Only around 6% suggest that DVLA should not allocate a VIN, or only do so as a last resort.

“A DVLA VIN should only be used where a vehicle's identity is unknown and where no identifying chassis or monocoque details are found.”

“Only when a VIN is not present, whether it be due to rust or missing tags, then a new VIN and historic plate should be issued according to dates from and to when that particular model was originally manufactured.”

“For a new chassis built for a new car ie not been on the road before, or for a car that the VIN cannot be proven.”

“If a kit car builder doesn't want to allocate his own VIN number then DVLA could allocate one.”

Question 3.41

A VIN is a unique identifier for a vehicle and is used by DVLA when assessing a vehicle's originality and identity. This is done by checking archives and obtaining information from experts in the field. Where the original VIN is no longer present, how could DVLA authenticate a vehicle's identity and originality instead of allocating a DVLA VIN? Please provide evidence and reasons to support your views.

We received **711** responses to this question.

There were a number of suggestions made, including:

- 39% (279) that DVLA continues to work with specialists to authenticate an unknown vehicle's identity – for example, marques, owners' clubs, manufacturers
- 11% (79) using previous records or photographic evidence

Around 16% suggest that an alternative way is not possible, or that assigning a VIN is the only possible option.

"Authenticated marque experts are the best source of accurate information."

"The current system of DVLA issued VIN works well in the main, with dating confirmation obtained from owners' clubs who have the relevant documents and knowledge. For others to make up a VIN would lead to errors, complication and duplication."

Question 3.42

If you are a vehicle manufacturer, would you have concerns about the original VIN being retained or restamped on the vehicle, where the manufacturer has not approved the changes to the vehicle? Please provide evidence and reasons to support your views.

123 (20.7%) Yes – would have concerns for the following reasons (with 64 respondents adding a comment):

- 25% (16) – removes authenticity or history of vehicle
- 14% (9) – due to legal concerns or 'product liability'
- 13% (8) – think that it could be open to fraud

"A VIN number is the link to the factory records that can tell you everything about the vehicle including when it was made, what model, what spec, what factory options was added and to whom it was sold."

254 (42.8%) No – would not have concerns for the following reasons (with 149 respondents adding a comment):

- 37% (55) – the manufacturer is no longer liable
- 16% (24) – the original manufacturer may no longer exist
- 13% (20) – believe that the original VIN is the identity

"I think it is unreasonable for anyone to assume that a vehicle will not undergo modifications at some point in its life. This should not affect the reputation of a manufacturer based on the fact that there is a VIN present from that manufacturer."

216 (36.4%) Not sure (with 50 respondents adding a comment).

Apart from 38% (19) that had no opinion, the main reasons include:

- 14% (7) – depends on the modifications made
- 10% (5) – the original manufacturer may no longer exist

“Sometimes rust or damage repairs necessitate the removal of the original chassis stamping and this should be restamped in the original position and style.”

Only 10 comments were provided from those who did not choose an option, with similar themes emerging.

Question 3.43

We currently allocate a DVLA VIN where a chassis or monocoque bodyshell (or frame for motorcycles) has been replaced or modified. Modern vehicles have the VIN hard-coded into electronic control units and potentially stamped or engraved in other components. In these instances, do you think a DVLA VIN is still relevant? Please provide evidence and reasons to support your views.

409 (50.4%) Yes – still relevant for the following reasons (with 203 respondents adding a comment):

- 50% (101) – to maintain a physical record or check for historic or traceability reasons
- 18% (37) – to prevent fraud or overcome Electronic Control Unit (ECU) issues, for example, can be hacked or reprogrammed
- 9% (19) – the current system works so no need to change

“This would help a buyer understand that the vehicle has been rebuilt in some way.”

“The current systems works perfectly well.”

201 (24.8%) No – not relevant for the following reasons (with 102 respondents adding a comment):

- 35% (36) – original VIN should be retained
- 14% (14) – only the stamped VIN should be used for history or traceability
- 12% (12) – DVLA VIN will no longer be relevant

“If there exists original registration documentation supporting a VIN number then the DVLA should not issue a new VIN number and the original VIN number should be clearly stamped on the vehicle if it is not already in existence.”

“The vehicle already had a VIN number that should be retained.”

202 (24.9%) Not sure (with 31 respondents adding a comment).

- 19% (6) – to maintain a physical record or check for historic or traceability reasons
- 16% (5) – DVLA VIN will no longer be relevant
- 13% (4) – to prevent fraud or overcome ECU issues, for example, can be hacked or reprogrammed

“In many cases the DVLA VIN is not relevant and in any case the allocation of a DVLA VIN may prove problematic.”

“This is irrelevant at the moment. Such modern vehicles are decades off being classed as historic.”

Only 18 comments were provided from those who did not choose an option, with the main theme relating to the DVLA VIN no longer being relevant.

What other countries do

Question 4.1

Do you think there is any best practice from other countries that could be implemented here? Please provide evidence and reasons to support your views.

We received **436** responses to this question.

134 (14.5%) Yes (with 132 respondents adding a comment).

- 24% (32) – should be international standards
- 18% (24) – UK should adopt the US model
- 8% (11) – UK should adopt a general European model
- 8% (11) – UK should adopt the French model

“I believe some countries’ classification of historic vehicles is earlier than UK. Always worth considering how others do things even if we do not agree!”

187 (20.3%) No (with 123 respondents adding a comment).

- 92% (113) think that the UK should continue to maintain or set its own standards.

“This country should retain its own set of regulations and not be overturned by other countries’ regulations to retain some rights for this country to say what is right or wrong in any cases.”

600 (65.1%) Not sure (with 145 respondents adding a comment).

- 40% (58) – unsure of other countries’ policies or standards
- 22% (32) – UK should maintain or set its own standards, as currently

“Other countries’ practices may inform our own. I am however unaware of how other countries register and identify their historic and classic vehicle.”

From the 36 comments provided from those who did not choose an option, apart from those that are not sure of other countries’ policies, the main view is that the UK should continue to maintain or set its own standards.

Establishing independent advisory groups

Question 5.1

Do you think that DVLA should explore the option of setting up independent advisory groups to support the registration process for historic vehicles? Please provide evidence and reasons to support your views.

We received **539** responses to this question.

722 (70.0%) Yes (with 539 respondents adding a comment).

- 64% (346) believe that DVLA should use motoring clubs or independent experts, not just government bodies

“Involve experienced owners of classic cars and classic car clubs when you do this. A lot of people simply do not understand classic cars and/or their owners.”

195 (18.9%) No (with 145 respondents adding a comment).

- 24% (35) – an independent advisory group does not need to be set up
- 17% (24) – setting up a new group would be a waste of money or resource
- 16% (23) – DVLA should use motoring clubs or independent experts, not just government bodies

“The cost would be prohibitive considering the numbers of vehicles involved. Owners’ clubs are the best source of advice for historic vehicles.”

“Overly complicated. Will be expensive and unnecessarily bureaucratic.”

114 (11.1%) Not sure (with 42 respondents adding a comment).

- 33% (14) think that DVLA should use motoring clubs or independent experts, not just government bodies
- 12% (5) feel that the current system works as it is

“As stated, specialist clubs have considerable knowledge and DVLA should utilise this.”

“Honestly I don't think a new advisory group is necessary – just work with existing, high profile classic, vintage and veteran car societies.”

From the 25 comments provided from those who did not choose an option, the main view is that DVLA should use motoring clubs or independent experts, not just government bodies.

Additional question

Question 5.2

If you wish to put forward any evidence, suggestions or ideas not already mentioned around the registration processes, please provide your thoughts around how these might work.

We received **673** responses to this question.

The main view, for **21% (142)** is that DVLA should collaborate more with the motor industry. Suggestions include:

“Trust your marque specialists a little more as they will know far more about historic/classic cars and what is correct and incorrect than a special DVLA division will ever be able to learn – about a specific marque.”

“Work with garages that register under the HVUG or a similar scheme that are experts in classic cars and utilise them to do the distinctions and checks for the DVLA. Will help support industry and stop cars being wrongly stripped of VINs”.

10% (63) think that DVLA needs to review or change its policies and procedures on classic or modified vehicle registrations. Suggestions include:

“The DVLA should ask itself ‘what ills are we preventing with these rules’ – if you can’t think of the use/benefit for if a Kit car should be on a Q plate or not, then get rid of the rule, the same for rebuilt and reconstructed vehicles.”

“[redacted] would like to see a registration regime which actively seeks to find ways in which a problematic vehicle can be registered and is open to accepting judgement decisions rather than a systemised yes/no approach.”

Other suggestions include:

- reduce or change registration or vehicle categories (3%/19 comments)

“You have too many classes/categories to pigeon hole vehicles into – make it easier – a vehicle is either a genuine classic, a reconstructed classic or a kit car.”

Have a unique vehicle record which shows any changes made to the vehicle or owner history (2%/15 comments).

“All cars at a determined age, say 20 years plus, should have a passport style record with the car electronically recording all changes and ID of the car, etc. There are many independent companies starting to offer this to digitise the history of the car, so why are the DVLA not doing this as THE registering authority. Every classic and historic car registered in the UK should have a digitised passport that can be viewed by potential purchasers, the owner, the authorities etc. Taking away any ambiguity of provenance and changes during the car’s life...”

Ensure consistency for DVLA staff dealing with applications or all procedures (1%/4 comments).

“All we would say is that in general the DVLA system in place has served the historic agricultural tractor movement well. We would ask for consistency in consideration of applications as there can be elements of ‘which desk the application lands on’ affecting the decision. In my position of authorised signatory for this club I have found that my interactions with DVLA staff to be courteous and helpful.”

Next steps

DVLA would like to thank all respondents who participated and provided their views in this call for evidence. The findings in this high-level summary report reflect the responses received. Further detailed analysis and consideration of the responses is being carried out with a view to formulating proposals for potential change.

