DVLA/DfT ‘call for evidence’ consultation responses – Wheels-Alive ‘Part Five’: Findings in greater depth

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Author:

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Further to Wheels-Alive's initial summary of the DVLA/DfT 'call for evidence' consultation responses **on classic, kit built and radically altered vehicles, and those converted to electric power… In this, the final instalment of our five-part analysis,** Dave Moss once again delves deeper into the complexities of the resulting information available.

This feature covers:
Section 4 on: Q and QNI registration numbers; – questions 3.36 to 3.39 plus The Vehicle Identification Number (VIN) – questions 3.40 to 3.43, plus: Section 5 on What other countries do – question 4.1, Possible establishment of independent advisory groups – question 5.1 and Further evidence, suggestions or ideas around the registration processes – question 5.2

If you missed it, or wish to refer back to it, the direct link to our initial summary is: wheels-alive-analysis-of-results-from-the-dvla-dft-call-for-evidence

Wheels-Alive is covering this 'Deep dive' analysis in manageable chunks, as outlined below, rather than trying to include everything in one huge article.

A Deep Dive, closer look at the report's data and findings – by Dave Moss

The following pages look closely at findings from each question in the report, arranged so that consultation responses of specific interest can be found quickly and easily. The report's data and information, responses and comments are broken down into separate sections based on the consultation questions' original subject groups, headings and question numbers.

Deep Dive Index

Questions were framed into twelve specific areas as listed below. The Wheels Alive response analysis is listed by section numbers corresponding to the related consultation question numbers.

Section 1 – already published on Wheels-Alive, on 16th October 2025. If you missed this, the direct link is: wheels-alive-part-two-findings-in-greater-depth/

- Historic and classic vehicles registration – questions 3.1 to 3.5
- The reconstructed classic scheme – questions 3.6 to 3.10

Section 2 – already published on Wheels-Alive, on 23rd October 2025. If you missed this, the direct link is: wheels-alive-part-three-further-findings-in-greater-depth/

- Rebuilt vehicles; – questions 3.11 to 3.17
- Restored vehicles – questions 3.18 to 3.22

Section 3 – already published on Wheels-Alive, on 30th October 2025. If you missed this, the direct link is: wheels-alive-part-four-more-findings-in-greater-depth/

- Kit-built and kit-converted vehicles; – questions 3.23 to 3.28
- Radically altered vehicles – questions 3.29 to 3.32
- Vehicles converted to electric propulsion – questions 3.33 to 3.35

In this feature:

Section 4

- Q and QNI registration numbers; – questions 3.36 to 3.39
- The Vehicle Identification Number (VIN) – questions 3.40 to 3.43

Plus Section 5

- What other countries do – question 4.1

- Possible establishment of independent advisory groups – question 5.1
- Further evidence, suggestions or ideas around the registration processes – question 5.2

Notes

- What happens next
- Where to find the complete DVLA/DfT consutlation response summary report

Deep dive Section 4

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.

Mixed feelings were evident among the 726 responses to this question. 32% (232) felt that the current process is sufficient, and should remain in place; 22% (160) felt that Q plates should only be assigned when the identity of the vehicle cannot be determined, or it has no previous identity; 5% (36) thought that the process works well for kit cars – and a further 3% (22) that it provides clarity for potential purchasers.

There were a variety of comments from those disagreeing with the current Q registration number system on why they feel it does not work. The main themes appear to be that it is unfair, or devalues vehicles, and that an age-related registration number should be assigned as an alternative – with Q numbers should only be assigned when all other options have been exhausted.

Amongst the quoted comments:
A Q plate is understood to be for 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 misuse 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?

There were 1005 responses to this question, of which only 224 (22.3%) answered yes, in general agreement with this long-standing policy. Another 80 (8%) agreed depending on the extent of the modification, and 60 (6%) agreed if modifications do not meet original manufacturer's specifications.

A majority of 672 (66.9% of responses) said no, they disagreed with this policy (and 561 of them added a comment). Amongst other responses, 57 (5.7%) felt that Q plates should be abolished, and the same number felt Q registrations should apply only if modifications do not meet original manufacturer's specifications. 108 respondents (10.7%) indicated they were unsure,

Amongst quoted general comments for this question:
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 registrations used.

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

Specific comments from the “no” lobby included .
Disagree as long as it retains original dimensions etc, while retaining the original chassis/monocoque.

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.

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.

Of the 710 responses to this question, around 50% (354) considered it important, the main reason offered being that full disclosure is required so that purchasers are aware of what they are buying. However 302 respondents (42,5%) did not consider it important, the main reason offered here being that it is the buyer’s responsibility to check.

Comments included
Yes, important, 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.

876 people responded to this question. with 59% (517) agreeing that an alternative age-related registration should be assigned, rather than a Q number. 18% (158) thought that the original registration number should remain with the vehicle, and 14% (123) either did not agree, or thought that the current Q registration policy should still apply.

Comments on this question included
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 the DVLA should allocate a VIN? Please provide evidence and reasons to support your views.

Though there were 793 responses to this question, no clear majority surfaced in favour of any particular new course of action. However, over 50% included comments specific to the allocation of VIN numbers by the DVLA.

143 (18%) of respondents felt it should do so when the original identity or origin is unknown; 87 (11%) when the original VIN is lost or no longer visible; 63 (8%), to brand new vehicles only; and 32 (4%) only to kit cars. Around 6% suggested that DVLA should not

allocate a VIN, or only do so as a last resort.

Comments on this question included:
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 i.e. not been on the road before, or for a car where 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.

Suggestions made in 711 responses to this question included 277 (39%) feeling that the DVLA should continue to work with specialists to authenticate an unknown vehicle's identity – for example, marque or owners' clubs, or manufacturers. 78 (11%) suggested using previous records or photographic evidence, and around 16% felt that no alternative way is possible, or that assigning a VIN is the only possible option.

Comments included:
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.

Although it seems unlikely that all of the 594 replies to this question actually came from vehicle manufacturers, 20.7% (123) of respondents said yes, they would have concerns, with the chief reasons cited by 16 of them being that it removes authenticity or history of vehicle. while 9 felt there might be legal concerns over 'product liability', and 8 thought that it could be open to fraud.

64 "yes" respondents added a comment, of which the DVLA chose to quote only one:
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.

However, 254 respondents (42.8% of the total) said No, they would not have concerns
Amongst these, the principal reasons cited were: 56 (22%) said the manufacturer is no longer liable; 24 (9.4%) suggested the original manufacturer may no longer exist, and 20 (7.9%) believed that the original VIN is the identity.

Although 149 "No" respondents added comments, the DVLA chose to publish only one:
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.

Over 36% of all respondents (214) said they were "not sure", with 50 adding a comment of some sort, and 18 (3.1%) claimed to have no opinion.

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 hardcoded 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.

Around half of 811 respondents to this question (409, 50.4%) said Yes, it is still relevant, with 50% of them (205) feeling it necessary to maintain a physical record or check for historic or traceability reasons, 18% (74) seeing it as helping to prevent fraud or overcome Electronic Control Unit (ECU) issues, such as hacking or reprogramming, and 9% (37) feeling the current system works so, there is no need to change.

Some 203 “Yes” respondents added comments, amongst them,
This would help a buyer understand that the vehicle has been rebuilt in some way.

The current systems work perfectly well.

On this question, 201 (24.8% of the total) respondents said No, DVLA VIN’s are not relevant, with 35% of them (70) saying the original VIN should be retained, 14% (28) saying only the stamped VIN should be used for history or traceability, and 12% (24) feeling a DVLA VIN will no longer be relevant.

102 “No” respondents added a comment, amongst them:
If original registration documentation exists 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.

If the vehicle already had a VIN number that should be retained.

202 respondents (24.9%), a number virtually equal to the “No” camp, were “Not sure”. 31 of these added a comment, and there were comments also from the 18 respondents who did not choose any option.

Amongst these comments
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.

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Deep dive Section 5

What other countries do – question 4.1
Possible establishment of independent advisory groups – question 5.1
Further evidence, suggestions or ideas around the registration processes – question 5.2

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.

There were 436 responses to this question, of which 134 (30.7%) said “Yes”.Of these, 24% (32) said there should be international standards, 18% (24) said the UK should adopt the US model, 8% (11) felt the UK should adopt a general European model and another 8% (11) that the UK should adopt the French model. 187 people (42.9%) said “No”, with 92% of them (172) thinking that the UK should continue to maintain or set its own standards.

A majority of 283 (65.1%) were “Not sure”, with 40% (113) saying they did not know other countries’ policies or standards, and 22% (62) believing the UK should maintain or set its own standards, as currently.

In this question, 132 “Yes” respondents added comments, as did 123 “No” respondents and 145 of those who were “Not sure”. Another 36 comments were provided by those who did

not choose any option, The main view to emerge here was that the UK should continue to maintain or set its own standards. Responses to this question were unusual in that virtually everyone who responded added some individual comments.

Amongst the comments received:
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!

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.

Other countries' practices may inform our own. I am however unaware of how other countries register and identify their historic and classic vehicles.

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.

1031 responses were received for this question, of which a clear 70% majority (722) answered "Yes", with 539 people adding comments. Of these, another majority, of 64% (462), believed that DVLA should use motoring clubs or independent experts, not just government bodies.

Meanwhile 195 (18.9%) voted "No", with 145 respondents adding comments. Of these 24% (47) said that an independent advisory group does not need to be set up; 17% (33) felt that setting up a new group would be a waste of money or resource.

Another 114 respondents (11.1%) were "Not sure", with 42 adding a comment. Amongst these, 33% (38) still thought that the DVLA should use motoring clubs or independent

experts, not just government bodies, and 12% (14) that the current system works as it is.

Some comments from across all these responses:
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.

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.

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.

Another 25 comments were provided by those who did not choose any option, from which the main view was that DVLA should use motoring clubs or independent experts, not just government bodies.

Additional input 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.

The main view to emerge from 673 responses to this "open floor" question, shared by 141 (21%) of respondents, was that the DVLA should collaborate more with the motor industry.

Suggestions on this included:
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% (67) respondents thought that DVLA needs to review or change its policies and procedures on classic or modified vehicle registrations. Suggestions included:
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, and 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.

reduce or change registration or vehicle categories (3%/20 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%/13 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 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%/7 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/ what happens now

At the time of compiling this summary in early October 2025, neither the DoT nor the DVLA had indicated any official timescale for changes as a result of findings in this consultation/call for evidence.

On publication of its findings in late August, the DVLA stated that "further detailed analysis and consideration of the responses received is being carried out, with a view to formulating proposals for potential change."

Where to find the complete official consultation summary report
The full 27 page DVLA/DfT summary is available at
calls-for-evidence/registering-historic-classic-rebuilt-vehicles-and-vehicles-converted-to-electric-call-for-evidence/outcome/response-summary-report