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DVLA/DfT 'call for evidence' consultation responses – Wheels-Alive 'Part Four': More findings in greater depth

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Clasic Mini converted to electrical propulsion. Photo © Kim Henson.



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**, Dave Moss once more delves deeper into the resulting information available.

This feature covers the sections on 'Kit-built and kit-converted vehicles', and 'Radically altered vehicles' and 'Vehicles converted to electrical propulsion'...

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 – in this instalment...](#)

- [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](#)

[The following sections will follow in due course; please watch this space!](#)

Section 4

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

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 consultation response summary report



Deep dive section 2

- 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

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.

43% (292) of the 680 respondents to this question agreed that the current guidance remains relevant. The principal view that emerged was that this is a small sector, which does not need further regulation, although not many reasons were provided,

Amongst respondents' suggestions for improvements, 5% (34) said make changes to the testing, build or usage of the vehicles, and another 5% thought legislation should be less strict or be fairer. 3% (20) suggested separate legislation for rebuilds and kit cars.

Amongst quoted comments in this section:

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.

764 people responded to this question, of which 71% (542) believing that reconditioned or



remanufactured components should be considered the same as those that are brand new. There was a clear view that they are often of better quality than new components. However 16% (122) did not agree, though few reasons were provided. Some felt that new components will be safer.

Quoted comments:

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.

47% (355) of the 756 responses received for this question felt assessment was either not needed or not practical.

Of those giving a reason for or against assessment, typical comment themes were:

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.

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.

While 46% (333) of the 725 respondents to this question felt that no changes are required, a sizeable minority felt that kit-built vehicles should be registered as new. 32% (232) – said “yes”, (the principal reason being – they are new builds – or should be tested for safety); and 4% (29) felt kit cars should have separate legislation, or a Q registration number.



Amongst the quoted comments:

No, kit-built vehicles 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.

A 58% (427) majority of the 737 responses to this question did not feel this is necessary. Of those who believe it is necessary, 26% (192), felt it should be indicated in whole or in part (mainly to inform potential buyers).

Amongst the quoted comments:

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 or 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.



711 responses were received, with 58% (412) thinking it unimportant for evidence to be provided showing the source of parts. Of the 21% (149) believing this evidence should be provided, it was suggested that this could also include listing of part specifics, or be shown on sale receipts.

Amongst the quoted comments:

No, not really necessary, a knowledgeable owner or prospective purchaser will be able to use their own judgment 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.

Of the 840 responses received for this question, 67% (563) thought that the definition should be “any major change in original components or resemblance” (for example, engine or transmission performance, or body or frame). 11% (92) thought 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.

Amongst the quoted comments:

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 for radically altered vehicles is still



relevant, please provide evidence and reasons to support your views.

35% (209) of the 598 respondents felt that the current guidance is still relevant, while 23% (138) - thought that the guidance needs updating - to include new or evolving methods, technologies, vehicle types, enforcement, etc. 9% (54) thought the current guidance is not relevant or too complex, while further 31% (185) were either unsure of the guidance or gave no relevant response.

Amongst the quoted comments:

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.

Half of the 781 respondents to this question felt the 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). 26% (203) either gave no relevant response or felt that the DVLA does not need to be notified, while 12% (94) felt the DVLA should be advised of any changes that mean a vehicle no longer aligns with the V5C information.

Amongst the quoted comments:

Structural and significant aerodynamic modifications should require the vehicle to undergo an inspection at 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.

Amongst the 763 responses to this question 34% (259) felt other components should also be considered (for example, engine or transmission etc). 25% (191) were content with the current guidelines, agreeing that the main emphasis on modifications should be to the chassis or bodyshell. 11% (84) thought all components should be considered, or anything that no longer aligns with the information on the V5C, and 4% (31) felt that consideration should only be given to anything that affects the safety of the vehicle.

Amongst the quoted comments:

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?

The majority of 841 responses to this question favoured a separate policy. Suggestions for the actual process included 18% (151) suggesting a vehicle safety assessment or inspection to ensure the conversion has been properly carried out: 13% (109) agreed without providing



specific details, while 5% (42) suggested battery weight should be assessed against that of the vehicle, and upgrades made if needed.

Amongst the quoted comments:

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.

Amongst the 775 responses received, suggestions included: 18% (140) - battery or electrical wiring safety checks; 13% (101) - testing to ensure that the vehicle can handle the additional weight, and 12% (93) wanted an annual MOT test suitable for electric vehicles (EVs).

Amongst the quoted comments:

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?

28% (200) of the 715 responses suggested the identity was affected at the time of the conversion; 21% (150) when the chassis or monocoque is significantly altered; and 5% (36) when the weight of the vehicle exceeds the original design - or weakens the structure.

Amongst the quoted comments:

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.