



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

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

[This feature covers the sections on 'Rebuilt vehicles' and 'Restored vehicles'...](#)

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 – in this feature

- [Rebuilt vehicles](#); – questions 3.11 to 3.17
- [Restored vehicles](#) – questions 3.18 to 3.22

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

Section 3

- [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

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
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Notes

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- [Where to find the complete DVLA/DfT consultation response summary report](#)

Deep dive section 2

Rebuilt Vehicles

Question 3.11: What do you think should be the definition of a rebuilt vehicle?



899 responses were received to this question. 26% (233) – said: rebuilt to original specification using a combination of old and new parts; 8% (72) said that no definition is needed; 7% (63) – dismantled with parts restored or replaced, then reassembled; another 63 said simply a restored vehicle; and 6% (54) said “with original chassis, VIN or VRN remaining”.

Amongst the quoted comments:

“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 rebuilt vehicle 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.

There were mixed views amongst the 879 responses to this question, with a number of suggestions for improvement: 12% (105) felt the current guidance OK but needs updating, for example, for electric vehicle conversions; 11% (97) felt it too restrictive, for example, makes it difficult to keep original identity and registration number; 9% (79) felt electric conversions should not be classed as rebuilt classic or historic vehicles; 8% (70) felt it should allow for additional modifications, for example, improves safety and reliability.

Amongst the quoted comments:



“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”.

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.

A 69% (539) majority of the 781 responses to this question believed there should not be separate policies. A small minority were in favour of separate policies: 5% (39) saying yes, or all different; 3% (26) saying yes, separate only for motorcycles, and 2% (16) saying the current guidance needs to be reviewed or made clearer.

Amongst the quoted comments:

“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.

Of the 912 responses to this question, 38% (347) felt the DVLA needed to know if rebuilt to different specification from original manufacture; 15% (137) if numbered items were replaced (chassis, engine, bodyshell); and 11% (100) none or to no extent.



Amongst the quoted comments:

"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.

Three options were offered; responses and the top themes for each were :

Option 1 responses

Of the 1000 responses, 486 (48.6%) said Yes (with 112 respondents adding a comment); 31% (31) believe it still appropriate; 24% (24) powertrain changes (engine, transmission, propulsion, etc); 8% (8) anything safety related: and 6% (6) if it changes the original appearance of the vehicle.

Amongst the quoted comments for option 1:

"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".

Option 2 responses

328 (32.8%) - No (with 273 respondents adding a comment). 22% (220) - chassis or monocoque repairs. or like for like, to improve strength and safety should be allowed; another 220 suggested powertrain changes (engine, transmission, propulsion, and so on); 9% (90) felt modifications in keeping with the vehicle's history should not change the identity.

Amongst the quoted comments for option 2:

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.

Option 3 responses

186 (18.6%) Not sure (with 68 respondents adding a comment); 24% (240) - chassis or monocoque repairs or like for like, to improve strength and safety should be allowed; 13% (130) - powertrain changes (engine, transmission, propulsion, and so on); 9% (90) - depends on standard of components used or quality of work.

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).

Amongst the quoted comments for option 3:



“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”.

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.

850 responses were received on this. 39% (332) – said “when not rebuilt to original specification or appearance is changed, for example, shape, size colour”; 20% (170) – said “at no point”; and 7% (60) – when chassis, bodyshell or frame is replaced rather than repaired.

Amongst the quoted comments:

“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.

The 890 responses to this question were remarkably evenly split, with 49% (436) considering it important. The main theme was that the documentation or history of the



vehicle should be made available to the buyer. However 48% (427) did not consider it important, with reasons including:

16% (142) – buyer’s responsibility to check; 12% (107) – not important (non-specific); 7% (62) – any modifications should be obvious to an enthusiast.

Amongst the quoted comments:

“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?

The two principal responses to the three options offered for answering this question were that “there was no need for change”, and 51.2% of 993 respondents wanted “assessment to continue according to the current policy for rebuilt vehicles”. However many respondents were either “not sure about the current policy” or added comments, the principal themes of which were:

- restored and rebuilt should be a single category to avoid confusion.
- MoT’s to be carried out following restoration.



- There should be a specific process for assessing restored vehicles.
- restored vehicles are not the same as rebuilt.
- independent assessment or inspection by specialist needed.

Two other interesting themes to emerge from this question were:

- no need for specific inspection or test for restored vehicles.
- DVLA should not intervene.

***Question 3.19: What do you think should be the definition of a restored vehicle?
Please provide evidence and reasons to support your views.***

826 responses were received to this question; with the main suggestion groups being 25% (207) saying “a vehicle restored to original standard or appearance”; 15% (124) said that “no separate definition is needed”; 14% (116) said “restored using as many original parts as possible”; and 5% (41) said “restored as original, with modern safety features”.

Amongst the quoted comments:

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.

A convincing majority. Some 76% (518) of the 681 responses to this question thought no separate policy is needed. 8% (55) said “yes”, or “all different, so need their own policies”; while 3% (20) said a separate policy required for motorcycles. 2% (14) said no, but consider a different approach for commercial or agricultural vehicles.

Amongst the quoted comments:

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.

This question drew 761 responses, of which 28% (213) said when appearance or function is changed, for example, shape or size, use of vehicle; 15% (114) did not agree that such modifications should affect the identity; 8% (61) said when chassis, bodyshell or frame is replaced rather than repaired, and 7% (53) said only when significant or major changes made to the vehicle.

Amongst the quoted comments:

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.

43% (314) of the 730 respondents to this question considered it important, with the main theme being that the documentation or history of the vehicle should be made available to the buyer.

55% (402) do not consider it important, with reasons including: 16% (117) – buyer's responsibility to check; 13% (95) – any modifications should be obvious to an enthusiast; 8% (58) – DVLA should not be involved, leave it to the seller and purchaser.

Amongst the quoted comments:

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.