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## DVLA/DfT 'call for evidence' consultation responses – Wheels-Alive 'Part Two': Findings in greater depth

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This Jaguar X300 is now 30 years old and cars of this age are regarded by many enthusiasts as classics... Photograph © 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 now delves deeper into the resulting information available.

[This feature covers the sections on 'Historic and classic vehicles registration' and 'The reconstructed classic scheme'...](#)

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 will cover 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 – in this feature

- [Historic and classic vehicles registration – questions 3.1 to 3.5](#)
- [The reconstructed classic scheme – questions 3.6 to 3.10](#)



The following sections will follow in due course; please watch this space!

## Section 2

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

## 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

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- What other countries do - question 4.1
- Possible establishment of independent advisory groups - question 5.1
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## Notes

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

## Deep dive section 1

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

## Historic and classic vehicles registration

Q 3.1: What do you consider to be a historic or classic vehicle?

There were 1115 responses to this question, amongst which 27% (301) thought it should be



a vehicle aged 40 years or over, 20% (223) suggesting a vehicle aged 30 years or over, and 18% (201) a vehicle aged 25 years or over.

Amongst other suggestions, 5% (56) suggested an old or rare vehicle, 3% (33) a vehicle no longer in production, and 2% (22) – a vehicle 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.

Amongst the 1,017 responses to this question. 49% (509) said the current process should remain, saying the current process works well, or no need to have a separate registration process. 7% (71) felt the current system could be kept, with some improvements, and another 71 believed that the age-related registration numbers should be retained. There were however mixed views on whether or not this should be as part of a separate process.

Amongst the quoted comments:

“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.

There were 993 responses to this question, with an 86% (854) majority saying that there is no need for a specific series of registration numbers for historic and classic vehicles.

Question 3.4: Should there be a new type of safety check in place which takes into account the age of an historic or classic vehicle?

This potentially controversial question garnered 1,083 responses, of which 36% (390) felt that there is no need for a new type of safety check. However, there was no big or solid majority in favour of a new testing regime, and over 200 did not commit either way. There were nonetheless more votes in favour of some form of check, with the main themes being: 18% (195) – yes, same or similar to current MOT test, 10% (108) – yes, basic check for roadworthiness 8% (87) – an MoT style test which is appropriate to age of vehicle, for example, no need for a check of emissions, and 5% (54) – an ad-hoc inspection when vehicle is used on the road or following major restoration.

Taken together, amongst those expressing an opinion there was thus a majority of 446 to 394 in favour of a new type of safety check, but the large number of non-committals suggests this is hardly a convincing victory for re-introducing classic vehicle testing.

446 to 394

Amongst the quoted comments:

“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?

There were 1,053 responses to this question, with a numerical majority (444 to 342) in favour of a distinction being made. However as with testing (Q3.4) well over 200 respondents did not express a view, so again there seems to be no especially convincing majority in favour.

Some 32% (337) felt that no distinction should be made. Amongst those in favour 18% (190) – simply said yes (making limited suggestions) 7% – (74) said yes, replicas should be registered as new if not based on previously registered vehicle, original chassis or frame 6% (63) said yes, replicas should be registered as new or not use old VIN numbers. Another 63 said yes, replicas should be subject to safety inspection, IVA or MOT, and 5% (53) said yes, replicas should be issued with a Q registration number

Amongst the quoted comments:

“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”.



## The reconstructed classic scheme

Question 3.6: If you think the current guidance is still relevant, please provide evidence and reasons to support your views.

This question garnered 762 responses, amongst which 40% (305) agreed that the current guidance is still relevant, although not many reasons were provided. The prevailing view was that the guidance does not cause any issues so no need to change things. However, slightly less than 40% felt that the existing guidance is no longer relevant and should be updated. 16% (122) said current guidance is no longer relevant or needs updating in general, 9% (69) that the guidance fails to acknowledge that using some new components is unavoidable. 3% (23) wanted an MOT requirement, while 15 respondents wanted safety modifications to be allowed.

Amongst the quoted comments:

“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?



814 responses to this question provided various combinations of definitions, the principal ones being: 12% (98) who suggested it should be "reconstructed to the same design specification as original vehicle"; another 12% suggested "built using all or a majority of period parts"; and 10% (81) said "original chassis, engine, body or gearbox remaining".

Amongst the quoted comments:

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.

A majority of the 911 responses to this question did not agree that this approach is appropriate. 28% (255) - disagreed in general, without being specific about why; 15% (137) - disagreed on the basis that the issue should be about original specification rather than age; another 138 disagreed, saying safety is more important, and 10% (91) disagreed saying original parts are not always available.

Amongst the quoted comments:

"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.

Three options were provided in order to answer this question; the summary includes answers given, and the top three themes mentioned for each of the options.

## Option 1

Of 1004 respondents 507 (50.5%) said the reconstructed classic scheme should be specific to vehicles not previously registered - with 346 people adding comments. 27% (271) said registered vehicles have a traceable history that should remain with the vehicle; 15% (151) said its unfair to apply retrospectively, and 11% (110) - pointed out that restored vehicles are not the same as newly reconstructed vehicles.

Amongst the quoted comments for this option:

“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”.

## Option 2



241 (24.0%) said it should also apply to already registered vehicles that have been rebuilt or restored; 30% (301) indicated there was a need to protect the classic car industry; 14% (141) said all vehicles should be inspected; and 10% (100) mentioned safety reasons.

Amongst the quoted comments for this option:

“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”.

### Option 3

256 (25.5%) were not sure (with 76 respondents adding a comment); 24% (241) said no need for reconstruction classification or scheme; 9% (90) the identity of an unregistered vehicle may not be known; and 7% (70) said difficult to determine or enforce.

Amongst the quoted comments for this option:

“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”.

Some 42 respondents did not choose any of the three options, but provided comments, the main theme amongst them being the 55% (23) who said: “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.

There were 929 responses to this question, with 25% (232) feeling the main distinctions between replicas and reconstructed classics are that “it looks like an original but with different major components such as the chassis, bodywork or engine”; for 24% (223) a replica looks like an original but is built mainly, or all, from new parts; and for 14% (130) a replica is an imitation or copy of an original vehicle, usually with no history.