Introduction to the Wheels-Alive analysis of results from the DVLA/DfT ‘call for evidence’ on classic, kit built and radically altered vehicles, and those converted to electric power.

Published: October 9, 2025

Author:

Online version:

https://www.wheels-alive.co.uk/introduction-to-the-wheels-alive-analysis-of-results-from-the-dvla-dft-call-for-evidence-on-classic-kit-built-and-radically-altered-vehicles-and-those-converted-to-electric-power/



Photograph © Kim Henson.

Dave Moss reports on this important ‘call for evidence’ and responses to it.

Kim writes: I am greatly indebted to my colleague Dave Moss for his in-depth and very time-consuming work in analysing in detail the published results from the DVLA/DfT ‘call for evidence’, as outlined above. These results run to many pages and many thousands of words, and rather than try to include all these in one huge article, on Wheels-Alive we are going to break this down into more manageable sections, starting with, in this feature, the stated reasons for, and coverage of, the ‘call for evidence’, plus an introductory section we have entitled, “Digging into the report’s summary of responses”.

In the near future we shall be covering in greater depth each question/response/section included in the report, and we believe that taken together, this will represent the most comprehensive breakdown of all aspects published so far, deliberately framed in a ‘report’ style and hopefully in an easy-to read format. It will be interesting to hear what our readers think about the responses to the ‘call for evidence’...

Dave describes these ‘Deep dive’ explorations thus: “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.”

Please watch this space for future instalments covering these ‘Deep dive’ explorations, which will follow in due course.

Meanwhile, for now over to Dave Moss, who writes:

There can be few people with an interest in running, repairing, restoring and maintaining classic or modified vehicles, or the licensing or registration of them, who weren't aware that this DVLA consultation closed on July 4th 2024, and it took until August 2025 for its findings to be announced. The delay involved analysing 1,371 detailed responses, and many additional comments, received in response to 46 sometimes complex questions posed in an online questionnaire. 1,162 of these responses came from individuals, the remaining 129 being submitted by organisations with interests in the historic and modified vehicle fields.

The "call for evidence" document was framed by the DVLA and Department of Transport around existing laws which – in broad summary – require vehicle keepers to notify the DVLA of any changes made to their vehicle (regardless of it's age) which result in details indicated on the vehicle registration certificate (V5C) becoming incorrect. This currently allows for systemic-driven updates, tightly managed with published guidance available, all in particular – and mostly long-established – ways. Accuracy of the vehicle's DVLA record is thus maintained, with any updates/changes notified then showing on a revised or new V5C form, sent to the vehicle keeper. These details are always accessible to law enforcement agencies.

An explanation of current policies in specific areas accompanied the consultation, with opinions and background knowledge sought about whether, and where, updates might be required to reflect changing times and attitudes – and evolving technologies – in the registration, restoration, rebuilding and conversion of "kit cars", and older vehicles in general.

Questions were grouped into twelve specific areas as follows:
Historic and classic vehicles registration – questions 3.1 to 3.5;
The reconstructed classic scheme – questions 3.6 to 3.10;
Rebuilt vehicles; – questions 3.11 to 3.17;
Restored vehicles – questions 3.18 to 3.22;
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;
Q and QNI registration numbers; – questions 3.36 to 3.39;
The Vehicle Identification Number (VIN) – questions 3.40 to 3.43;
What other countries do – question 4.1;
Possible establishment of independent advisory groups – question 5.1;
If wished – put forward evidence, suggestions or ideas not already mentioned around the registration processes – question 5.2

On August 20th 2025 the DoT and DVLA published its "Call for evidence outcome Response summary report", (they do so love snappy titles) containing details of responses to questions under the twelve headings, highlighting the main emerging themes, and including some comments arising. The report notes the wide variety of experience, expertise and commitment amongst those responding, but gives no clues about whether – and to what extent – any of the findings will, or might, inform changes in legislation affecting the various vehicle sectors involved.

Digging into the report's summary of responses

Here on Wheels-Alive, from the very considerable amount of data, views and information that has been published in the the 27 page DVLA/DoT report summary, we have undertaken a brief analysis of the key points emerging from those report questions which garnered the most responses, and also conducted a deeper dive into the detailed responses for each question, grouped and indexed by subject headings. This allows readers to choose between a headline overview, or a quick and easy way of finding any and all consultation responses of specific interest, including detailed numbers and comments, all based on the original subject groups and question numbering.

Note that in both cases, the quoted response numbers and percentages don't always total 100%, chiefly due to rounding, some inconsistencies in the numbers provided, and inclusion or exclusion of "not sures", "don't knows" and numbers of unique individual comments in each section.

——————————————-

DVLA/ DfT report – a headline overview – by Dave Moss

Introduction

Just six of the 42 questions in section 3, the main body of this consultation, received over 1000 responses, as did one question in section 5, which invited comments on “Establishing independent advisory groups”. This is an area that has raised concerns in some sectors in the past, so a strong response is perhaps unsurprising.

However, over 1000 responses for just 7 of 45 questions when 1371 people responded to the consultation in total should not be interpreted as meaning that the remaining questions did not provoke as much interest or concern, since the DVLA/DfT is at pains to point out that not everyone answered every question. In some cases also quite a significant number of “don’t know” and “not sure” answers were recorded – and again, some simply didn’t provide specific answers, but did provide comments – and some provided both. This left the DVLA/DfT with the unenviable task of interpreting things as best they were able so that comments could be added in one way or another to each question’s responses. This said, it does seem likely that questions showing the most responses are probably the ones about which those completing the consultation felt most strongly.

The top seven questions, when graded by number of responses in descending order, were 3.1, 3.4, 3.5, 5.1, 3.2, 3.37 and 3.9. Respondent numbers for questions 3.37 and 3.9 were separated by just one person.

Top topics, biggest numbers, and interesting findings…

Question 3.1
The consultation’s highest number of responses (1115) was received for the question: “What do you consider to be a historic or classic vehicle”?
Opinions were split three distinct ways, with 27% (301) thinking it was a vehicle aged 40 years or over; 20% (223) a vehicle aged 30 years or over: and 18% (201) a vehicle aged 25

years or over. There were other suggestions outside pure age boundaries: 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 3.4
This was arguably the most controversial question in the consultation: “Should there be a new type of safety check in place which takes into account the age of an historic or classic vehicle”?
It brought forth 1,083 responses, of which 36% (390) felt that there is no need for a new type of safety check. However, in aggregate there were more votes favouring 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) suggesting 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 a specific opinion, there was thus a slender majority in favour of some sort of safety check being re-introduced, but set against this, with over 36% definitively saying there is no need for a new test, and another 200 (18.5%) non-committals, this does not seem to add up to a convincing vote to re-introduce classic vehicle testing.

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

1053 responses were received for question 3.5: “Should a distinction be 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 was a numerical majority of 444 (42.1%) to 342 (32.5%) in favour of a distinction being made. However, well over 200 respondents did not express a particular view, making detection of a convincing majority one way or the other difficult.

Question 5.1
This question was in the section entitled “Establishing independent advisory groups”, and asked “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”.
There appeared to be strong feelings here, with 1031 responses received, and a clear 70% majority (722) answering “Yes”, with 539 of them adding comments. Of these, a 64% (462) majority believed that the DVLA should use motoring clubs or independent experts, not just government bodies.

Meanwhile 195 people (18.9%) voted “No”, with 145 respondents adding further comments. 24% (47) of this group said that an independent advisory group does not need to be set up, while 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. Another 25 comments came from those not choosing any option, from which the main view was again that DVLA should use motoring clubs or independent experts, not just government bodies.

Question 3.2
There was potential for strong feelings here, with the question asking “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."

Of the 1,017 respondents, 49% (509) felt the current process should remain. The remainder were very much split, with the biggest numbers being 7% (71) who felt the current system could be kept with some improvements, and another 71 believing that age-related registration numbers should be retained. There were, however, mixed views in several quoted comments on whether or not there should be a separate process. See our full analysis for more details.

Question 3.37
There has long been controversy over Q registrations, well demonstrated by the strength of feeling revealed in answers to this question: "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", and asked: "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?

Only 224 (22.3%) of the 1005 respondents answered yes, they agreed 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. However, a majority of 672 (66.9% of responses) said no, they disagreed with the policy, with 561 adding comments.

Other responses included 57 (5.7%) who 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%) said they were unsure. A wide range of comments were received for this question; you can see a selection in our deep dive analysis.

Question 3.9

With 1004 responses, this question came within one vote of 3.37 above, asking: “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.”

Answering this question was quite complex, with three yes/no options to choose from, and it also attracted plenty of comments; more details of findings are in our full deep dive analysis, which summarises answers given, and some of the themes mentioned for each option.

The headlines for Option 1 were: 507 (50.5%) of respondents said the reconstructed classic scheme should be specific to vehicles not previously registered, and 271 (27%) said registered vehicles have a traceable history that should remain with the vehicle. For Option 2, it emerged that 241 (24%) felt the reconstructed classic scheme should also apply to already registered vehicles that have been rebuilt or restored, and 30% (301) indicated a need to protect the classic car industry. In Option 3 256 (25.5%) were not sure – with 76 of them adding comments – and 24% (241) said no need for reconstruction classification or scheme.

There were less than 1000 responses for all other questions in the consultation; question 3.42, concerning VIN numbers, elicited the lowest number, at 594. Interestingly, that was just over half
the number responding to 3.1, the first and most popular question in the consultation.

What now?
When this summary was compiled, in early October 2025, neither the DoT or the DVLA had indicated any official timescale for any changes as a result of 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.” How long this process might take was not mentioned.

Where to find the complete official consultation summary

The full 27 page DVLA/DfT summary is available at https://www.gov.uk/government/calls-for-evidence/registering-historic-classic-rebuilt-vehicles-and-vehicles-converted-to-electric-call-for-evidence/outcome/response-summary-report

Coming soon on Wheels-Alive (please watch ths space)… Our ‘Deep dive’ into the findings, relating to ‘Section 1’, covering Historic and classic vehicles registration, plus the ‘reconstructed classic scheme’.