

Driver and Vehicle Licensing Agency

Call for Evidence

FBHVC Response - Final

The Federation of British Historic Vehicle Clubs (FBHVC) www.fbhvc.co.uk was formed in 1988 with the objective to “Maintain the freedom to use Yesterday’s Vehicles on Tomorrow’s Roads”. It represents over 500 clubs, 50 museums plus individual and trade supporters, in total more than 250,000 historic vehicle enthusiasts. These enthusiasts own and use all forms of powered vehicles which are 30 or more years old including motor cars, motor-cycles, buses and coaches, commercial vehicles, vans, agricultural, military and steam vehicles.

The Federation has a continuous record of Research conducted since 1996 and our latest research, the National Historic Vehicle Survey, valued the historic vehicle sector at £7.2bn per annum.

Although it is extremely positive and very welcome FBHVC nevertheless consider the Call for Evidence questionnaire to be less than entirely clear in providing background information for all of the questions it poses and was concerned that respondents, particularly those who may not deal with historic vehicle registration matters and DVLA on a regular basis, may not fully appreciate the significance.

To address this concern and to ensure that the views of Federation members were correctly represented a simplified survey was constructed and circulated. This proposed a response to each question and requested indication of agreement or otherwise, if the respondent chose ‘disagree’ a free-text box allowed the submission of their concerns or suggestions.

At the time of writing 4,485 submissions from this survey had been received with 81.2% expressing no disagreement. Nevertheless all the comments were read and where possible have been incorporated in this FBHVC response to the Call for Evidence

Although attempts have been made to answer each of the relevant questions individually it should also be stated that the FBHVC view is that the registration procedures for historic vehicles have become confused over the years with a number of different categories (rebuilt, reconstructed, old vehicles, radically altered etc) where the precise distinction between them is now blurred. Overall the FBHVC desire, and recommendation, is that one new category be created in which all historic vehicles and all levels of repair or restoration, including none, can be considered under one set of criteria.

As would be expected FBHVC only offer comment insofar as it applies to historic vehicles.

Call for evidence questions Section 3 – historic and classic vehicles

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

FBHVC is unaware of any accepted definition of ‘classic vehicle’ and does not wish to attempt such a definition.

FBHVC accept the international definition of a historic vehicle used by FIVA (Fédération Internationale des Véhicules Anciens) which defines it as a mechanically propelled vehicle at least 30 years old, preserved and maintained in a historically correct condition, which is not used as means of daily transport and which is therefore part of our technical and cultural heritage.

However the acceptance of this definition requires a little further explanation in the context of the UK. The Federation recognises that the ‘historic’ tax class applies to vehicles 40 or more years old. Additionally, aware that their definition was to be for international use, FIVA quite correctly sought to distinguish between old vehicles enthusiastically maintained as cherished heritage artifacts and essentially similar vehicles which in some less affluent locations survive purely as basic and cheap everyday transport. This led to the adoption of the phrase ‘... *not used as a means of daily transport* ...’ FBHVC considers that this should in no way preclude the periodic use of a historic vehicle for routine domestic travel as desired.

The phrase ‘... *maintained in a historically correct condition* ...’ is not considered to preclude any like-for-like repair, restoration or replacement. To what extent deviations from original specification are acceptable within this definition is extremely difficult to define but the Federation attempts to address this in each section of this response.

Vehicles used and maintained in this manner have no significant impact on road traffic or air quality whilst sustaining transport heritage and providing enjoyment to their owners and to the general public.

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?

There should be a registration process for historic vehicles with emphasis placed on efficiently issuing the most suitable and historically correct registration that can be achieved.

The process is likely to differ from that for modern vehicles as the references and evidence required to ensure correct registration of historic vehicles may exist in many different forms and adequately assessing it may require a degree of informed judgement. Ideally there would be suitable experts within DVLA to run this process with their performance assessed in terms of success rate.

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?

There should not be a dedicated series of registration numbers to distinguish historic vehicles. The original registration of the vehicle should be retained where possible to preserve the heritage of the vehicle and if this is not possible a normal series registration appropriate to the age of the vehicle should be issued.

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

The existing periodic testing regime (MoT), with an exemption from compulsory testing for the majority of historic vehicles over 40 years old, but with the provision for voluntary tests if desired, is broadly satisfactory although there are issues with its application to historic HGVs.

However there may be circumstances, for example following major restoration or repair work, when a one-off safety check would be appropriate. This may need to be a more in-depth inspection than the MoT, possibly including some degree of dismantling to permit full access to all parts of the vehicle but, in common with the MoT, should assess the vehicle with reference to the technical standards applicable when it was new.

Individual Vehicle Approval which requires modern technical standards is entirely inappropriate and not suitable in this context.

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 should not be a distinction between genuinely representative historic vehicles using a majority of period parts however they are constructed. Neither should previous registration be a criterion as registration history may not be available. There should however be a distinction between vehicles restored or preserved using a majority of period parts and replicas newly built with predominately new parts.

Call for evidence questions Section 3 – reconstructed classic vehicles

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

The current guidance is still largely relevant but it should be acknowledged that the use of some new (or newer) components is likely to be unavoidable and indeed essential in relation to safety critical items.

For vehicles built with a separate body and chassis, including sidecars for motorcycles, it is possible that a newly constructed body will be necessary as many of these bodies utilise a wooden framework which does not in general survive for as long as the metal components of the vehicle. Such bodies should not impair the recognition of a vehicle as historic.

3.7 What do you think should be the definition of a reconstructed classic vehicle?

The current definition is satisfactory in recognising that it may be necessary to garner parts from more than one old vehicle to assemble one good one. Note however comments regarding new or newer parts and bodies in 3.6 above.

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.

In essence it is appropriate but with the following caveats

- the use of some new (or newer) components may be unavoidable, it should be noted that many specialist clubs commission the manufacture of otherwise no longer available parts
- 25 years could perhaps be 30 years to match the historic vehicle definition.
- vehicle manufacturers were bound to produce replacement parts for 10 years after production of the vehicle ceased. This should be reflected in guidance.

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?

The registration or otherwise of a vehicle in this category is irrelevant and, in any case, may not be known, possibly due to the loss of records over time or because the vehicle is an import.

3.10 What do you consider to be a replica vehicle as opposed to a reconstructed classic or historic vehicle?

A replica is a vehicle where the majority of major components are new or emanate from a completely different vehicle whilst a reconstructed historic vehicle is a vehicle where the majority of major components are from the correct period and from similar vehicles.

Call for evidence questions Section 3 – rebuilt vehicles

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

3.12 Do you think the current guidance is still relevant? For example, does it take into account emerging technologies and innovation.

3.13 If you think there should be separate rebuilt policies for different vehicle types (motorcycles, cars, vans, etc

3.14 To what extent should a vehicle be rebuilt before DVLA needs to be informed?

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?

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?

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,

For historic vehicles this category should be replaced by a new category of 'Restored Vehicles' see below.

Call for evidence questions Section 3 – restored vehicles

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?

There should be a specific process.

The procedure of restoring a historic vehicle is likely as a matter of necessity to differ in a number of ways from that of rebuilding a more modern vehicle. In general terms the longer the period of time that has elapsed since the vehicle ceased to be maintained and used the greater the degradation it will have suffered. This coupled with the increasing scarcity of original components will unavoidably require more far-reaching efforts to rectify.

3.19 What do you think should be the definition of a restored vehicle?

A restored vehicle is a vehicle 30 or more years old which following a period of disrepair has been returned to a condition similar to when it was new or to a specific time in its history.

Whilst the use of new (or newer) components, including structural items, or the repair of original components, may be unavoidable, there should be enough of the original vehicle remaining to enable a suitably knowledgeable person to identify make, model and approximate year of manufacture.

For vehicles with a separate body and chassis restoration may require the production of a completely new body. Vehicles which carried separate bodies were often offered by the manufacturer with a choice of body style and a replacement body of a different style to the original but period-typical in terms of appearance and method of construction should be acceptable.

3.20 If you think there should be separate policies for different vehicle types (motorcycles, cars, vans, etc)

To maximise clarity and simplicity there should be a single policy of a generic nature which can be applied to all vehicle types.

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?

Like-for-like repairs, including the fitting of replacement parts including a new chassis or monocoque bodyshell to the same if not necessarily identical specification as the original should not be regarded as modifications where they are carried out to a good standard. They should not affect the identity of the vehicle, nor should minor modifications (e.g. the

addition or deletion of a small bracket or the drilling of holes). Modifications similar to those known to have been carried out in period should not affect the identity.

Permanent removal, addition or alteration of major components such as side members (longerons), major cross-members, tubes in a motorcycle frame or permanent removal of large structural panels (e.g. roof) from monocoque bodies should be considered as modifications which affect the identity of the vehicle.

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

The majority of purchasers, owners and prospective owners of historic vehicles supported by the specialist clubs are generally very knowledgeable and will recognise the likelihood of historic vehicles having undergone a major restoration and be able to assess the implications. In any case it is not considered appropriate for the registration system to indicate this nor is it necessarily within their competence.

Call for evidence questions Section 3 – kit-built and kit converted vehicles

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

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.

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.

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.

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.

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.

FBHVC understand this section to refer to first registration of newly constructed kit-built and kit converted vehicles. Nevertheless for the avoidance of doubt it should be made clear that kit-built and kit converted vehicles constructed 30 or more years ago should be treated as any other historic vehicle as set out in the other parts of this response.

Call for evidence questions Section 3 – radically altered vehicles

3.29 What do you think should be the definition of a radically altered vehicle and why?

As with all points in this document FBHVC only offer comment insofar as it applies to historic vehicles.

In principle FBHVC consider the existing definition to be satisfactory and it should apply if major alterations are made such as to produce a vehicle which could reasonably be considered to be a different vehicle to the original.

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

The guidance is still broadly relevant but as in many cases new chassis/monocoques/frames are no longer available it should be extended to permit used items and like-for-like repair or partial replacement. Component definitions would benefit from updating, e.g. with independent suspension there is no 'axle' as such, and to clarify the motorcycle requirements.

3.31 To what extent should a vehicle be radically altered before DVLA needs to be informed?

Obviously any changes affecting the information shown on the V5C must be notified to DVLA but beyond that it is not possible to define.

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?

Major mechanical changes e.g. engine (or other source of power) or type of suspension should also be considered.

Call for evidence questions Section 3 – vehicles converted to electric propulsion

Questions 3.33 to 3.35

FBHVC is aligned with the FIVA position that a historic vehicle not originally electric powered but now converted to electric propulsion is no longer a historic vehicle and thus these questions are not within its remit.

Call for evidence questions Section 3 – Q and QNI registration numbers

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

Q registration should not be assigned until all alternatives have been exhausted. The issue of a normal registration of a format appropriate to the age of the vehicle should be facilitated if further evidence is found that removes the original doubt that led to the issue of the Q registration.

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?

No

Only major alterations to structural components should cause a Q registration to be issued. Like-for-like repairs or partial replacement should not be considered as modifications. Safety related changes, e.g. fitting seatbelts, should be considered on their merits by a technically competent assessor. Fitment of roll cages and similar as mandated for cars used for competition, many of which are required to be road registered, should also be assessed on merit.

Where it is necessary to replace/repair a structural component that carries the chassis number a suitably authenticated remarking of the number should be permitted without causing the allocation of a Q registration.

3.38 If you consider it important for a consumer purchasing a vehicle to know if it's been modified

The majority of purchasers, owners and prospective owners of historic vehicles supported by the specialist clubs are generally very knowledgeable and will recognise any significant modification to a historic vehicle and be able to assess the implications. In any case it is not considered appropriate for the registration system to indicate this nor is it necessarily within their competence.

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?

The original registration of the vehicle should be retained wherever possible to preserve the heritage of the vehicle and if this is not possible a normal series registration appropriate to the age of the vehicle should be issued.

Call for evidence questions Section 3 – allocation of a DVLA VIN

3.40 In what circumstances do you think DVLA should allocate a VIN?

When no other identification can be established or when the original identity of the vehicle has completely changed. The majority of historic vehicles did not originally have a VIN as defined.

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?

The specialist historic vehicle clubs have a wealth of knowledge and experience of their particular vehicles often supported by substantial archives. Their members are likely to have similar vehicles that could be referenced for comparison purposes. In many cases experts can date vehicles to within a year or so by feature. All avenues of this nature should be exhausted before a vehicle is defaced with a new VIN.

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?

We are not vehicle manufacturers.

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 hard-coded into electronic control units and potentially stamped or engraved on other components. In these instances, do think you a DVLA VIN is still relevant?

No

In many cases the DVLA VIN is not relevant and in any case the allocation of a DVLA VIN may prove problematic.

Note: Given the 30-year-old definition of historic this issue is relevant to the newer vehicles in the cohort.

Call for evidence questions Section 4 – what other countries do

4.1 Do you think there is any best practice from other countries that could be implemented here?

Not sure

We have insufficient detailed knowledge or practical experience of the very many different procedures used throughout the world to offer any constructive comment.

Call for evidence questions Section 5 – independent advisory groups

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?

Yes

As noted in 3.41 the specialist clubs have considerable knowledge and attempts should be made to utilise this. FBHVC can and is prepared to provide a coordinating and guiding function. The current V765 or Reconstructed Classic schemes could provide a procedural template for club involvement.

Additional information

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.

FBHVC would like to see, and is willing to work with the Agency to achieve, a pragmatic and constructive registration regime which –

- actively seeks to find ways in which a genuine but problematic historic vehicle can be registered as such whilst seeking to exclude the non-genuine.
- is open to accepting judgement decisions rather than a systemised yes/no approach
- is open to seeking and accepting advice from external sources
- recognises that historic vehicles are by definition old and that components unavoidably degrade over time with use, damage, corrosion etc
- recognises that the supply of original parts is constantly diminishing and that as a result the repair of parts and use of more recently manufactured parts is unavoidable and does not necessarily diminish the historic status of the vehicle.
- recognises that the motor industry has changed out of all recognition and that the continuance of a manufacturer name does not necessarily refer to the same company.