

## DVLA Matters

UK Club members may be aware that there has been some tightening of the DVLA approach to registering classic vehicles. We have been watching this story unfold and whilst there is little clarity being offered in relation to the complex rules, we thought we'd do our best to explain what is happening and how the rules already in place are currently being enforced.

A bit of history first. You may recall that the DVLA decided to close its local offices and centralise its records, including records of V765 (applications to register a vehicle under its original number) and age related registration applications. During this period a specific example came to their attention which suggested that, in at least one case, a registration had been issued based upon information which was not totally correct.

After some investigation, involving the Federation of British Historic Vehicle Clubs, of which this Club is a member, DVLA suggested that they had found a *significant number* of potential issues and would be contacting the keepers of the vehicles identified. This they did in July 2015, with a letter to some owners of particular marques asking for further documentary proof of the provenance, construction and origin of their vehicles (not our beloved Land Rovers I hasten to add).

Before we go into the latest situation, it is probably worth spelling out what the rules are. Unfortunately, this is not simple and it will take some getting through.

There are five (very poorly) defined categories that have relevance to members when it comes to registering or retaining a vehicle registration and each is treated differently.

- **Old Vehicles** Attempting to get either an age related or original registration on a Series One that has not been registered for many years
- **Rebuilt Vehicles** Restoring/rebuilding a Series One that is already registered with DVLA or that has not been registered for many years
- **Reconstructed Vehicles** Attempting to get an age related plate for a Series One that has been constructed from period parts from a number of vehicles
- **Radically Altered Vehicles** Replacing major components on a vehicle that is already registered or that has not been registered for many years
- **Imported Vehicles** Registering a Series One that has been imported to the UK

The DVLA 'speak' for each of the above is in bold, and you will notice that it's not impossible for a particular vehicle to come under more than one heading. This is particularly true of imported vehicles which require major work and of any vehicle where multiple major components need replacing rather than restoring. Land Rover's have been particularly susceptible to the latter over the years and many will have had major components replaced many moons ago, long before any of these 'classic vehicle' rules came into being. I'll say no more.

### Old Vehicles

Let's start with the stereo-typical 'barn find' that just needs a new battery, some fuel and some TLC to get roadworthy. If it has a number plate attached to it, all very nice, but unfortunately that will hold no sway with DVLA. They will want to see:

- Form V765 - 'Application to register a vehicle under its original registration number'. This must be endorsed by a vehicle owners' club – eg. LRSOC's Registrations Officer, Mick Burn.
- A recent photo of the vehicle and documentary evidence that links it (by chassis number) to the original registration number

For the latter, form V765 suggests:

- The original old style log book (RF60/VE60)
- Archive or library records showing the registration number and the chassis number authorised by the archivist, clearly defining where the material was taken from or other pre 1983 documentary evidence linking the chassis and the registration number.

Local authority registration records can be a great source of this information IF the original registration (from a number plate on the vehicle) can be traced back to a particular local authority. Of course, whether their records have been archived or still exist is another story.

Should this not be possible, then an 'age related plate' may be allocated. In this case the onus is on the owner to prove the age of the vehicle. Given Rover's excellent chassis numbering system and extensive records at the British Motor Industry Heritage Trust's archives in Gaydon, this is generally not a problem and an official Heritage Certificate can be obtained. Assuming you have a legible chassis number, of course.

*Note: If your barn find turns out never to have been registered (perhaps as it was used only on private land such as an airfield or farm, was imported some time ago and never used on the road, or no evidence exists as to its identity), the process is much more complex. The DVLA will require a form V55/5 for registering a 'Used Vehicle'. This process requires various forms to verify who you are and where you live as well as a new registration fee of £55. Seek advice from experts like the Club's Registration Officer, Mick Burn, before proceeding as getting this wrong can result in a vehicle becoming no more than a collection of parts.*

## **Rebuilt Vehicles**

Here it starts to get a little messy. Let's say your 'barn find' needs a little more than just TLC to get it back into a roadworthy condition. Perhaps it requires a replacement chassis, engine / gearbox or a number of other major components, in order to be considered as a whole vehicle. In this case, DVLA require you to apply using form V55/5 for registering a 'Used Vehicle'.

At the same time, you'll also need to send a completed form V627/1 to the DVLA as you have effectively "rebuilt or substantially changed a vehicle". Again, seek advice from the Club's Registration Officer.

Form 627/1 asks for all the major components details, including receipts for new parts used and the serial numbers of:

- Chassis
- Axles (both)
- Transmission
- Steering Assembly
- Engine
- Suspension (front and back)

However, in order to retain the original registration you only need to prove you have used:

- the original unmodified chassis or a new chassis of the same specification as the original
- AND 2 other major components from the original vehicle from the following:

- suspension (front and back)
- steering assembly
- axles (both)
- transmission
- engine

In practice, if you are looking to purchase a 'barn find' or vehicle that has no log book, things will be more straightforward if the vehicle is more or less whole and a chassis number is legible. In addition, the more major components you have with serial numbers matching the build year of your vehicle, the better.

*Note: A 'Rebuilt Vehicle' can be treated like any other historic vehicle particularly if it has been sympathetically restored using as many original components as possible. However, if too many original parts have been replaced, even with those of a similar year / specification from another vehicle, it could be treated as a 'Reconstructed Vehicle'.*

*If replacement parts 'substantially change a vehicle' from its original specification, a whole new teapot of eels is opened – see **Radically Altered Vehicles***

### **Reconstructed Vehicles**

So when is a vehicle 'Rebuilt' and when is it classed a 'Reconstructed' – those two terms seem to mean the same thing?

Basically, it is a Reconstructed Vehicle if it has been built from genuine period components from more than one vehicle, all over 25 years old and of the same specification to create a true reflection of the marque. This could be by design, or by default - a 'Rebuilt' vehicle may not be able to pass the burden of proof regarding original components stated above.

In addition to the **Rebuilt Vehicles** requirements, DVLA will insist that an appropriate vehicle owners' club for the marque inspect the 'reconstructed' vehicle and confirm in writing that it:

- has been inspected
- is a true reflection of the marque
- is comprised of genuine period components all over 25 years old

The Club must also give manufacture dates for the major components and DVLA will assign an age-related registration number to the vehicle based on the youngest component used.

*Note: Your vehicle won't get an age-related registration number if it includes new or replica parts and instead, the vehicle must pass the relevant type approval test (which would be unlikely in a Series One).*

### **Radically Altered Vehicles**

Radically altered vehicles are vehicles that have been '*altered from their original specification, but aren't kit conversions*'. They are treated in the same way as '**Rebuilt Vehicles**' but are much more likely to require an Individual Vehicle Approval (IVA), that type approval test again. This is an inspection and test against modern standards of car design and safety and it would be unlikely for even a radically altered Series One to meet the stringent EU requirements of same.

This might apply to an 80" chassis that has been lengthened, a Series One that has had a much more powerful engine replacement (eg. a V8) or had its suspension/steering significantly modified. There is no definition beyond that written in italics above and for that reason, members planning future modifications, or looking to purchase heavily modified vehicles that require registering, should proceed with great care.

*Note: Modifications made prior to the introduction of these rules occasionally come to the attention of the DVLA and whilst these have previously been registered for a number of years and been subject to annual MOT tests when they were required, the outcome of any future inspection or DVLA investigation cannot be stated with any degree of certainty going forward. Much will depend on the individual vehicle and, presumably, the date that such modifications were completed.*

### **Imported Vehicles**

Because an imported vehicle has not been previously registered in the UK, DVLA again requires the V55/5 for registering a 'Used Vehicle'. This is the form with the fee of £55 that requires much more proof of who you are, where you live etc. There is also a requirement to provide a copy of the Notice of Vehicle Arrival (NOVA) – an HMRC form used for VAT purposes when importing vehicles.

The only added complexity when importing a complete, roadworthy, vehicle is that in order to obtain an age related plate the burden of proof regarding the vehicle's age lies with the new owner. As mentioned, Rover's chassis number records are excellent but there are a few exceptions which have caused potential issues. Minerva vehicles, for example, were not built by Land Rover and many Minerva original records no longer exist. An original registration document from the country of export, stating the chassis number and date of manufacture, would be extremely useful. For Australian imports, records are much better but bear in mind that many were built in Australia using CKD kits from Land Rover. Whilst finding archive records of build dates is not impossible, it is worth researching this prior to committing to purchase and importing a vehicle.

From the above, you'll see that the often quoted points system is largely irrelevant. It actually applies only to **Radically Altered Vehicles** wishing to retain their original registration number. For this to be permitted, the vehicle must have 8 or more points from a table of absolutely original components and 5 of these points must come from having the original chassis (or a new and unmodified chassis, direct from the manufacturer).

### **So now you know the basics. What's the issue again?**

Well, it seems that some classic car marques are more valuable than others and indeed, some models within a marque's production are more valuable still. For a Land Rover owner, the vehicle's identity is its chassis (and corresponding number) and generally this does not change despite all the bits and bobs we may load onto our vehicles to personalise them. For us, the bodywork is effectively a series of parts which bolt on to the chassis.

However, many classic cars do not have a simple chassis and instead have a monocoque bodyshell construction (body and chassis as one unit). If certain bodyshell shapes are more valuable than

others, when a body deteriorates it may be aesthetically, and probably financially, pleasing to re-body the vehicle with an alternative. Herein lies the problem.

The rules above for **'Rebuilt Vehicles'** only allow *'the original unmodified chassis or a new chassis of the same specification as the original'*. It appears that with some marques, owners have replaced the body/chassis of their vehicle with ones of a different specification. It would be a bit like swapping the panels of an 80" basic vehicle with those of a Tickford Station Wagon. Interestingly, the above definitions don't seem to prohibit this, as the Tickford body panels aren't considered major components. However, the DVLA letters sent to various owners where the body and chassis are intertwined have clearly created some serious issues for some marques and their members.

In essence, DVLA are revisiting previous registrations and asking questions which were not asked at the time. Most recently this has involved a random sample of inspections for certain types of classic car registrations, in order to establish the extent of the issue.

So what?

Presently, we are not aware of any specific investigation into Land Rovers. The Federation of Historic Vehicle Clubs (FBHVC) has its work cut out representing all marques and has done a sterling job playing things straight down the line. If you are interested in the entirety of their discussions with DVLA, and the current status, you can read up by visiting their archive of newsletters <http://www.fbhvc.co.uk/members-pages/newsletter-archive/>

A full report is in issue 4/2015 and each subsequent issue has an update.

We'll continue to monitor the ongoing DVLA investigation and the lobbying that FBHVC are conducting with MP's. One thing is clear, the rules/words used above are not helping matters and the definitions need some tightening up. Centralising DVLA has also meant that their general staff have little idea about classic cars and their various nuances and often cannot interpret the rules/words with the consistency required.

If you need help with a project you have, make sure you contact Mick Burn, our Registrations Officer – details on the Committee page. Whilst we have to make a small charge for his service, I can assure you from the testimonies of others, it is not an area for the uninitiated to enter into lightly.

Mick has kindly proof read this article and provides the following additional info:

"Old Vehicles using a V765 form also need to complete a V55/5 form. Both forms I usually fill in for the applicant and get them to sign them. Both forms **MUST** be filled in using **BLACK** ink. **ALL** registration applications **MUST** be inspected to confirm chassis number. I carry out spot checks on the inspectors to confirm validity of inspection. DVLA are increasingly sending in their own inspectors to check everything is valid. If I suspect something is not right, I will ask DVLA to carry out an inspection. I'm not prepared to lose the ability to reassign either original registrations or age related registrations. DVLA are now operating a very strict regime regarding registrations. Do it correctly, provide the conclusive documentary evidence required and you shouldn't have any problems."

Thanks Mick. Do it once, do it right.