

FBHVC

news



The Newsletter of the Federation of British Historic Vehicle Clubs

Addendum to Issue 1, 2018

Inside

Roadworthiness Testing

How it will affect the UK's MoT Test

VHI Substantial Change Guidance

From the DfT

Clean Air Legislation

What impact for historic vehicles?

DVLA Update

News from the latest meeting



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The UK Member of FIVA





Addendum

For various reasons the copy in Newsletter 1/2018 relating to **Roadworthiness Testing**, **Clean Air Legislation** and **DVLA** became corrupted. We regard these articles to be of utmost importance to our members and have therefore decided to present these reports again in their correct format.

Please note the incorrect return address was printed on the cover sheet accompanying your Newsletter. The correct address for any returned copies should be

FBHVC, PO Box 295, Upminster, Essex, RM14 9DG.

Contents

- 3-6** Legislation & Fuels
Roadworthiness Testing
- 7-8** Legislation & Fuels
Vehicles of Historic Interest:
Substantial Change Guidance
- 9** Legislation & Fuels
Clean Air Legislation
- 10-11** DVLA

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The Federation of British Historic Vehicle Clubs exists to uphold the freedom to use historic vehicles on the road. It does this by representing the interests of owners of such vehicles to politicians, government officials, and legislators both in the UK and (through membership of Fédération Internationale des Véhicules Anciens) in Europe. There are over 500 subscriber organisations representing a total membership of over 250,000 in addition to individual and trade supporters. Details can be found at www.fbhvc.co.uk or sent on application to the secretary. FBHVC is a company limited by guarantee, registered number 3842316 and was founded in 1988.



KSC 144D



Department
for Transport

Roadworthiness Testing

At last all the speculation is over. We can now discuss the actual approach of the Government to the implementation of its obligations under the EU Roadworthiness Testing Directive and how it will affect the United Kingdom's MoT Test as it applies to historic vehicles and specifically Vehicles of Historic Interest (VHIs).

Section A. General Comments

1. To get any political questions out of the way first, though the UK is obviously exiting the EU, the UK Government's policy is that, until the actual leaving date, the UK is bound legally to apply every piece of EU legislation in accordance with its terms. All UK laws made in support of EU legislation will be carried over and these laws will only be changed if it is clearly an advantage to do so. As the general principles of the Roadworthiness Testing Directive were actively supported by the Government on road safety grounds, and as the Department for Transport (DfT) believe, with some justification, that the UK system of MoT testing is robust and effective, it is probable that these rules will continue post Brexit.
2. Most of the content of the Directive has nothing to do with historic vehicles. Much of the Directive does not require any change to the existing UK MOT regime.
3. The decision that the UK should avail itself of a right to exempt VHIs has been taken after both consultation and examination of the accident statistics. It is the view of DfT that an increased level of exemption beyond the current 1960 cut-off will not lead to a greater number of accidents. DfT has also a wish, in the interests of efficiency, to standardise how testers report their undertaking of the MoT test to the Driver and Vehicle Standards Agency (DVSA). They hope that exemption of VHIs will lead to a reduced number of MoT tests having to be undertaken on vehicles which were built to different standards than current vehicles and that this reduction will enable simplification of reporting. While this approach could have the effect of increasing standardisation of the way MoT tests are carried out, thus making testing of older vehicles with different characteristics more difficult, the Federation is not yet aware of that effect occurring or being planned in the actual testers manual. Only three new items to be tested, all being covered by the Road Vehicles Lighting (Amendment) Regulations 2017 which were laid in Parliament on 14 September.
4. The change provides a right to an exemption from the MOT. The Federation is aware that many owners, particularly of vehicles towards the newer end of the spectrum, will wish to continue to submit their vehicles for an annual MoT test. There is no prohibition whatever

on them continuing to do so, as of course has been the case with the former exemption for vehicles built up to 1960.

5. MoT testing and all matters which pertain to it are and remain the responsibility of the DVSA. Roadworthiness testing has nothing to do with vehicle registration or licensing, which is controlled by the Driver and Vehicle Licensing Agency (DVLA). The sole involvement of DVLA in the arrangements described below is to provide the platform for declaration by its keeper of a vehicle as a VHI. However, the pre-existing registration status of the vehicle may affect its eligibility as a VHI. This matter is further discussed in the substantive comments below.
6. The Federation is aware that earlier drafts of Guidelines published by the DfT caused great and indeed justified concern to Federation members. It is important to make clear that these guidelines are now in the past and that the only relevant documents are those referred to below.
7. While the eventual solution may not be quite what the Federation might have wished, we were deeply involved in the evolution of the Guidance into its current form, and we must give great credit to the staff of the DfT who have been dealing with this matter, under a significant amount of time pressure, for the extent to which they listened to and took account of our advice and views in reaching what we consider to be the workable and fairly light touch solution for which all parties wished.

Section B. Substantive Proposals

1. All aspects of changes to the MoT testing regime in the UK come into force, in line with the Directive, on 20 May 2018.
2. The DfT is availing itself of the right provided by the Directive to permit a limited exemption from Roadworthiness Testing for historic vehicles.
3. While the Directive assumes that motorcycles will not be included in the Directive until 2022, and has not yet laid down a final



list of criteria to be met in motorcycle roadworthiness testing across the EU, the DfT, considering that the UK MoT regime in respect of motorcycles is already robust and accepted, has decided to include those which qualify as VHIs within the ambit of exemptions. However, the criteria for categorisation of a motorcycle as a VHI is, for practical reasons, much simpler, as set out in Substantive paragraph 20 below.

4. Certain vehicles which operate commercially, however original, are not capable of exemption as VHIs from MoT testing. These are (a) buses and coaches built after 1960 and (b) all heavy goods vehicles.
5. Heavy steam vehicles remain excluded from all MoT testing.
6. DfT considers that the right to grant an exemption is limited by the precise permission in the Directive, and that it must therefore limit the right to exemption to those vehicles which meet the definition of a 'vehicle of historic interest' in the Directive. Not all EU Member State Governments have interpreted the Directive so strictly but the legal reasoning is perfectly clear. The actual legal basis is contained in the Motor Vehicles (Tests) (Amendment) Regulations (2017 No 850) which were laid before Parliament on 14 September 2017.
7. Section 7 of these Regulations deals with the definition of vehicles of historic interest. The wording essentially (with one exception) replicates the provisions of the Directive, as follows:
'vehicle of historical interest' means a vehicle which is considered to be of historical interest to Great Britain and which
 - was manufactured or registered for the first time at least 40 years previously;
 - is of a type no longer in production; and
 - has been historically preserved or maintained in its original state and has not undergone substantial changes in the technical characteristics of its main components.'The exception is the choice of forty, not thirty, years as the time limit for exemption. This is chosen generally to reflect the age that a vehicle requires to be to become entitled to 'historic' class Vehicle Excise Duty status.
8. There is further legislation, to which reference is made in Section A paragraph 3 and 11b of this Section B.
9. The policy of the DfT, as set out in a letter to the Federation chairman, David Whale, of 11 August 2017 from the Minister responsible, Jesse Norman MP, is that application should be by a 'voluntary, self-reporting system not affecting the vast majority of vehicles'.
10. The actual exemption regime will be administered by way of Departmental Guidance from DfT. This Substantial Change Guidance and accompanying Advice is reproduced in full following this article. It should be recognised that

departmental Guidance is not strictly a part of UK laws but is administrative in nature. What this Guidance does is to set out formally how DfT and its agencies, DVSA and DVLA, will administer application of the Legislation.

11. The exemption for VHIs replaces two previous global exemptions from the MoT.
 - a. All vehicles which the DVLA recognised as having been built before 1960 are exempt until 20 May 2018 but the Regulation will require all these vehicles to be VHIs in order to continue to be exempt.
 - b. Separately, old heavy goods vehicles (originally those built before 1940, latterly before 1960) were excluded (not exempted) from testing by reason of the Plating and Testing Regulations, for the sole reason that it is difficult, if not impossible to test them. However the Plating and Testing Regulations have been amended by the Goods Vehicles (Plating and Testing) (Miscellaneous Amendments) Regulations 2017, laid before Parliament on the same date as the main Testing Regulations. They remove historic vehicles from the list of excluded vehicles, meaning that the very small number of old goods vehicles which are so modified as not to qualify as VHIs should be subject to an MoT test after 20 May 2018. The Federation is not convinced that the distinction between exemption and exclusion was fully understood when the decision to remove these old vehicles from the list of exclusions in the Plating and Testing Regulations was made. DVSA do understand the situation and will try to assist in solving issues if any of these vehicles prove difficult or impossible readily to test. DVSA has also assured the Federation that any vehicle which is not to be tested does not require to be plated. Discussions on the modalities of this approach continue. Any vehicle owner encountering any practical issues with this position is invited to contact the Federation.
12. Much of the Guidance is the proposed regime for deciding whether a vehicle is a VHI. A vehicle built more than forty years ago is a VHI unless it has, within the previous thirty years, undergone a 'substantial change'. The Guidance sets out the criteria to be considered in assessing what constitutes a substantial change, primarily by assessing what is not to be considered substantial.
13. All comments from this paragraph onwards have to be recognised as expressing the views of the Federation. They do not alter the Guidance as such.
14. The process for recognition as a VHI is one of self-declaration. Each year, when the keeper of the vehicle applies for licensing for the next year, whether online or at a Post Office, which of course is required annually even for vehicles which are entitled to a nil rate VED, there will be a question about the status of the vehicle as a VHI. The precise wording of the question has not yet been published by DVLA. The Federation will publicise these words when they are known. There is currently no procedure for advancing the date of declaration from the due date for re-licensing.

15. If the keeper of a vehicle considers the vehicle to be a VHI, the keeper is entitled to tick the box and declare it a VHI. The vehicle will then be exempt from taking an MoT test during the next year.
16. Clearly if a vehicle which is declared as a VHI then undergoes a substantial change it will not continue to be a VHI and the keeper will not be able to declare it in the year subsequent to the change.
17. At the time of writing the transitional arrangements are not fully clear.
18. According to the legislation, it is the status of a vehicle as a VHI (not its declaration as such,) which infers exemption. This has differing effects as between pre- and post-1960 vehicles.
19. Pre-1960 vehicles, which are currently exempt, may not require licensing, and therefore their keepers may not be able to make a declaration as a VHI, until up to twelve months from the 20 May. Current advice from DVSA is that though the database will continue to show them all as exempt, and they will not be subject to any enforcement action until their date of re-registration. Keepers who will be choosing not to declare their vehicle as a VHI when it comes time for re-licensing would be wise to have their vehicles submitted for an MoT test prior to that date.
20. The position for post-1960 vehicles over forty years old is somewhat different. There is the same probability that many will on 20 May be scheduled to undergo their next MoT test before the next date for re-licensing. That is the status the database will show, although clearly under the legislation, if they are qualified as VHIs they ought to be exempt. If nothing changes, the advice would have to be to have the vehicle submitted for an MoT on the current due date and, if the keeper so decides, declare the vehicle as a VHI when the vehicle becomes liable for re-licensing which will mean exemption for subsequent MoT tests. This appears inconsistent with the legislation, a fact now recognised within DfT and the Federation will continue to progress this matter.
21. It will be possible for any keeper who considers that there is a benefit in having his vehicle recognised as a VHI, to both make a declaration as a VHI and also have the vehicle undergo a voluntary MoT test.
22. While there is not currently any proposed check on the correctness of the declaration, the Federation must advise members not to wrongly declare a vehicle is a VHI if it is known to have undergone substantial change within the previous thirty years.
23. Not least, in view of the fact that a vehicle's status as a VHI does not exempt the keeper from responsibility for keeping the vehicle roadworthy at all times, a finding after an accident that a vehicle ought not to have been

declared a VHI, and thus exempted from an MoT, could well be considered evidence that the vehicle concerned was not in fact being kept in a roadworthy condition.

24. There are two categories of criteria.
 - a. Those which describe the nature of change, largely by exception, and which are not to be applied to motorcycles, and
 - b. Those which, by reference to the basis upon which they were registered, are regarded by DVLA as too new to be eligible. Only this set of criteria applies to motorcycles.
25. It is not intended here to list the criteria, as it is assumed members can study the document itself. General points of note follow.
26. The VHI requirement refers to technical standards, not originality. This applies to all components, thus permitting the gradual like for like replacement of components of all types, including the chassis or monocoque, which many historic vehicles will have to undertake simply in order to remain roadworthy.
27. Generally, fitting of an engine which was available for the model of vehicle at the time is not considered 'substantial'.
28. In the listing of components, the absence of specific reference to transmissions is deliberate. It is recognised that almost every gearbox change will have been made for reasons of efficiency, safety or environmental performance.
29. Before making an assessment that a change is 'substantial' keepers should study the four general exemptions set out in the guidance.
30. The Guidance calls for any keeper who is in doubt as to whether his vehicle has suffered 'substantial change' within the past thirty years to seek the advice of an expert. While it is the joint understanding of the Federation that the overall effect of the Guidance as finalised should be that a greater proportion of UK historic vehicles will qualify as VHIs, the Federation has nevertheless undertaken to DfT, in order to ensure that there is limited scope for self-described 'experts' to enter the field, to set up a list of approved experts, which we trust will include many of our major member clubs. The Federation intends to have a list of experts in place together with a statement of what keepers will be entitled to expect, and indeed not entitled to expect, from those experts, before the new regime comes into force in May and we will be publicising that list for any keeper having a need to take advice on our website.

This article has taken account both of our understandings from our discussions with DfT and of questions asked by members since the Guidance was issued. I am aware that a number of members asked questions and were asked to be patient until they had had an opportunity to read this article. Now that you have had an opportunity to read our advice, if you still feel there are issues that are not clear, please do not hesitate to contact me either directly or through the Secretary.

Vehicles of Historic Interest (VHI): Substantial Change Guidance

Most vehicles manufactured or first registered over 40 years ago will, as of 20 May 2018, be exempt from periodic testing unless they have been substantially changed¹.

Large goods vehicles (i.e. goods vehicles with a maximum laden weight of more than 3.5 tonnes) and buses (i.e. vehicles with 8 or more seats) that are used commercially will not be exempted from periodic testing at 40 years.

A vehicle that has been substantially changed within the previous 30 years will have to be submitted for annual MoT testing. Whether a substantially changed vehicle requires re-registration is a separate process.

Keepers of VHIs exempt from periodic testing continue to be responsible for their vehicle's roadworthiness. Keepers of vehicles over 40 years old can voluntarily submit vehicles for testing.

Keepers of VHIs claiming an exemption from the MoT test should make a declaration when renewing their vehicle tax. The responsibility to ensure the declared vehicle is a VHI and meets the criteria, rests with the vehicle keeper as part of their due diligence. If a vehicle keeper is not sure of the status of a vehicle, they can consult a marque or historic vehicles expert, a list of whom will be available on the website of the Federation of British Historic Vehicle Clubs.

If a vehicle keeper cannot determine that the vehicle has not been substantially changed, they should not claim an exemption from the MoT test.

The criteria for substantial change

A vehicle will be considered substantially changed if the technical characteristics of the main components have changed in the previous 30 years, unless the changes fall into specific categories. These main components for vehicles, other than motorcycles², are:

Chassis (replacements of the same pattern as the original are not considered a substantial change) or **Monocoque bodyshell** including any sub-frames (replacements of the same pattern as the original are not considered a substantial change);

Axles and running gear – alteration of the type and or method of suspension or steering constitutes a substantial change;

Engine – alternative cubic capacities of the same basic engine and alternative original equipment engines are not considered a substantial change. If the number of cylinders in an engine is different from the original, it is likely to be, but not necessarily, the case that the current engine is not alternative original equipment.

¹ If the type of vehicle is still in production, it is not exempt from periodic testing.

² Further arrangements for motorcycles may be introduced, including if core testing standards are considered further internationally.

The following are considered acceptable (not substantial) changes if they fall into these specific categories:

- changes that are made to preserve a vehicle, which in all cases must be when original type parts are no longer reasonably available;
- changes of a type, that can be demonstrated to have been made when vehicles of the type were in production or in general use (within ten years of the end of production);
- in respect of axles and running gear changes made to improve efficiency, safety or environmental performance;
- in respect of vehicles that have been commercial vehicles, changes which can be demonstrated were being made when they were used commercially.

In addition if a vehicle (including a motorcycle):

- has been issued with a registration number with a 'Q' prefix; or
- is a kit car assembled from components from different makes and model of vehicle; or
- is a reconstructed classic vehicle as defined by DVLA guidance; or
- is a kit conversion, where a kit of new parts is added to an existing vehicle, or old parts are added to a kit of a manufactured body, chassis or monocoque bodyshell changing the general appearance of the vehicle;

it will be considered to have been substantially changed and will not be exempt from MOT testing.

However if any of the four above types of vehicle is taxed as an "historic vehicle" and has not been modified during the previous 30 years, it can be considered as a VHI.

This guidance is only intended to determine the testing position of a substantially changed vehicle, not its registration.

How to declare a vehicle for the 40 year MOT exemption

Vehicle keepers are required to ensure that their vehicles are taxed when used on a public road. From 20 May 2018, at the point of taxing a vehicle, the vehicle keeper can declare their vehicle exempt from MOT if it was constructed more than 40 years ago.

When declaring an exemption, you will be required to confirm that it has not been substantially changed (as defined in this guidance). This process will be applied to pre-1960 registered vehicles, as well as newer vehicles in the historic vehicle tax class.

If the vehicle does not have an MOT and you wish to continue using it on the public roads, you will have either to undergo an

MOT or, if you wish exemption from the MOT, to declare that the vehicle is a VHI.

If the vehicle has a current MOT certificate but you anticipate that on expiry of that certificate you will wish exemption from future MOTs you will at the time of relicensing be required to declare that the vehicle is a VHI.

How to tax your vehicle in the historic vehicle tax class

Where vehicle keepers first apply for the historic vehicle tax class, it must be done at a Post Office. If you are declaring that your vehicle is exempt from MOT, you will need to complete a V112 declaration form, taking into consideration the substantially changed guidelines, (as defined above). Further re-licensing applications, including making subsequent declarations that the vehicle does not require an MOT, can be completed online.

Further advice on taxing in the historic vehicle tax class can be found via the following link:

<https://www.gov.uk/historic-vehicles>

Advice (not part of the Guidance)

What do I need to do if I am responsible for a vehicle aged more than 40 years old and first registered in or after 1960?

From 20 May 2018 most of these vehicles will not need a valid MOT certificate to be used on public roads. You still need to keep the vehicle in a roadworthy condition and can voluntarily have a test. We recommend continued regular maintenance and checks of the vehicle.

You need to check whether the vehicle has been substantially altered in the last 30 years, checking against the criteria (in the guidance above). If it has been altered substantially a valid MOT certificate will continue to be required. If you are unsure check, for example from an expert on historic vehicles (list referenced in the guidance). If you buy a vehicle, we also recommend checking with the previous owner if you can.

The registration number of a vehicle should not be used to determine if the vehicle is a VHI as it may not reflect the vehicle's age (cherished transfers, reconstructed classic vehicles etc.) The registration certificate (V5C) is more authoritative, but there are specific cases for example related to imported vehicles where in some cases the age of the vehicle would not have been captured at point of registration.

If your vehicle does not have a current MOT certificate and is exempt from needing an MOT test you will need to declare this each time when you apply for Vehicle Excise Duty.

For large vehicles, see also the later sections.

What do I need to do if I am responsible for a vehicle first registered before 1960?

These vehicles are currently exempt from the requirement for a valid MOT certificate to be used on public roads. Most, but not all, will continue to be exempt. You still need to keep the vehicle in a roadworthy condition and can voluntarily have a test. We recommend continued regular maintenance and checks of the vehicle.

You need to check whether the vehicle has been substantially altered within the last 30 years checking against the criteria (in the guidance notes). If it has been substantially changed, an MOT certificate will be required for its use on public roads from 20th May 2018, even if the vehicle has previously not required an MOT.

If your vehicle does not have a current MOT test certificate and is exempt from needing an MOT test you will need to declare this each time when you apply for Vehicle Excise Duty.

If you are responsible for a large goods vehicle (more than 3.5 tonnes) or a public service vehicle (with 8 or more passenger seats) used commercially, you will require a valid test certificate if the vehicle has been substantially changed in the last 30 years or if, in the case of a goods vehicle, it is used when laden or towing a laden trailer.

Which old, large vehicles do not require testing from 20th May 2018?

Buses and other public service vehicles with 8 or more seats that are used commercially are exempt if they are pre-1960 vehicles. This is still the case from 20th May 2018 unless they have been substantially changed.

Buses that are not public service vehicles over 40 years old are exempt from 20th May 2018 if they meet the new definition of "vehicle of historical interest".

Large goods vehicles (of more than 3.5 tonnes) are exempt from testing, if first used before 1960 and used unladen, but provided (with effect from 20th May 2018) they have not have been substantially changed.

A small number of pre-1960 large goods vehicles will require goods vehicle tests. If they have never been tested, owners will need to apply for a first test using a VTG1 application form. This includes contact details for DVSA, which can be used in the event of practical problems, for example concerns about testability and finding a test centre.

Some separate exemptions from testing in full or parts of the test are relevant to some old, large goods vehicles. For example steam powered vehicles are exempt from testing. Another example is in respect of the petrol driven historic lorries, all spark ignition (petrol) vehicles over 3.5tonnes are exempt from a metered check in the test.

CLEAN AIR LEGISLATION

This is the only other subject on which I think I ought to comment this time round.

We did respond to the two consultations I mentioned in the last Newsletter. In both of our responses we emphasised the insignificant actual effect on the environment of historic vehicles and therefore the limited benefits to be obtained by excluding them from clear air zones.

The Oxford Zero Emissions Zone consultation was not to approve or object to specific proposals but was designed alert planners to factors which might influence future legislation. The intention signalled was to introduce actual prohibitions at first in central Oxford, and in due course a wider area, on any vehicles not powered by electricity. This approach could have massively adverse effects on residents of the area who own historic vehicles and would also have perhaps unforeseen impacts on Oxford. We decided that we had to widen the approach we have taken. We thus covered in our comments not only forty year old vehicles entitled to be in the 'historic' class, but those over thirty years

old, that is to say in line with the FIVA definition of what is a historic vehicle. And for the first time we offered for consideration the possibility of permits, both for residents and for vehicles visiting Oxford for heritage and cultural events which might benefit the economy of the city.

The Scottish Government has issued a consultation on 'Building Scotland's LEZs'. As mentioned in the last issue, the proposal prefers exclusion of traffic rather than charging schemes such as are proposed and indeed in effect in England. They do envisage a possible historic vehicle exemption, and, as the importance of exemption is increased significantly by a ban, a vehicle owner cannot simply choose to pay to travel within the zone. We therefore raised the possibility of exempting vehicles over thirty rather than forty years old and raised the question of permits.

We will keep you aware of the reactions, if any, which we get to these proposals and will make sure the historic vehicle community is not forgotten as stakeholders.

And consultations now come thick and fast.

We responded to a consultation on possible economic aspects of clean air zones. This consultation sought opinion on the question of scrappage schemes, which gave us a chance to request that any scheme should require special measures before a vehicle which is more than thirty years old is scrapped. The consultation also gave us an opportunity to emphasise the heritage and cultural importance of historic vehicles and their potential for creating economic benefits for the country, and again to suggest that, where exclusion rather than charging zones are being proposed, a cut-off date of thirty rather than forty years old should be considered.

And on a more local level,

- (a) Transport for London is consulting on a tidying up of its ULEZ proposals, and
- (b) Leeds is commencing examination of its own Clean Air Zone proposals.

In each case we will be making the case for sympathetic treatment of historic vehicles.



As intimated in my last notes we attended one of our regular liaison meetings with DVLA at the end of November last year. As is always the case this was a useful and productive day which on this occasion commenced with a tour of the relevant sections of the DVLA operation. This was provided for the benefit of Emma to give her an insight into the workings of DVLA but proved to be of interest and indeed useful to all of us.

We learned that DVLA receive three mail deliveries per day with a total of around 80,000 items and of these 15,000 to 20,000 are Royal Mail Special Delivery. This is the greatest number of any recipient. Every one of these items is X-rayed on receipt before being distributed to the appropriate area. Our guide re-emphasised the importance of the postcode in ensuring the mail is correctly distributed within DVLA. The relevant ones are listed below. From this it follows that any one envelope should only contain papers relevant to one operation, i.e. only one vehicle registration or only one driving licence, as each needs to be directed to a different department within DVLA. The further point was made that if an application is rejected for any reason and the papers returned with an addressed envelope for a reapplication this should always be used as the information in the address will ensure it returns to the correct member of staff.

We were introduced to the managers of each section who outlined their objectives and the procedures used to assess the performance not only of individuals but also of the system as a whole. As a part of this process we were shown a board displaying notes on current known problems amongst which we were very gratified to see issues we have raised.

I think everybody, both within DVLA and amongst the historic vehicle community, are aware that registration applications do not proceed entirely to plan in every instance, but we should perhaps remember two things. The first being the 80,000 items of mail per day and the second is, please believe me, DVLA are making considerable and well organised efforts to get it right.

The meeting proper commenced with a brief presentation of the DVLA systems upgrade. This is a massive task which involves not only bringing all the IT operations within DVLA but also updating what are, in some cases, very old procedures to current practice. Obviously whilst this is going on the day-to-day operations of DVLA have to continue so progress has to be slow and careful.

Make and Model Entry into DVLA Database

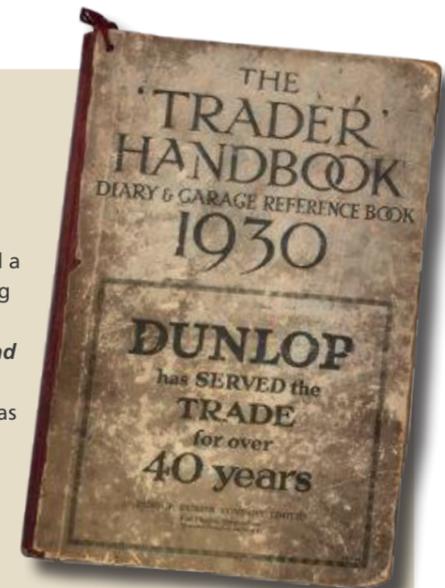
We were able to reiterate the concerns about the current inability to manually enter 'model' information on to the system during the first registration of a historic vehicle.

Preservation of DVLA Records

We also received a very emphatic assurance that the microfiche registration records that DVLA hold will be retained and in fact have recently been rehoused in a more up-to-date drum type filing system.

Trader Handbook

Some time ago a gentleman from a member club raised a question concerning the 'Trader Handbook Diary and Garage Reference Book'. This book was published annually from about 1903 up to at least the Second World War. It was a very ambitious attempt to provide the burgeoning motor trade with all the information it could possibly need in one book, including a desk diary. The contents varied from year to year over that period. A contemporary description of the book read thus:



A Useful Reference Book

'The Trader Handbook, Diary and Garage Reference Book' for 1932 is a most useful publication, which includes specifications of all types of motor vehicle on the British market and other handy information, such as Empire and foreign import duties. A new feature is a guide to makers and suppliers of garage and workshop equipment.

It is published by the Trader Publishing Co., Ltd., St. Bride's House, Salisbury Square, London, E.C.4, at the price of 10s. 6d., post free.

The feature that interests us here is that from the early 1920s up to 1931 a list of chassis/frame numbers and production dates for motorcycles, cars and commercial vehicles was included. The Federation has been able to view a 1926 edition of the book and the introduction to this section, which is entitled 'Tracing the year of manufacture', makes it clear that the source of the published data was the manufacturers themselves. Unfortunately, not all manufacturers saw it as in their interest to supply the information. Each annual publication repeated the information from previous years.

It should be remembered that the first Glass's Check Book for cars appeared in 1933 with commercial vehicles following in 1937 and motorcycles in 1946. Thus, although far from comprehensive, the 'Trader' handbook would add a useful amount of knowledge relevant to the earlier vehicles.

DVLA have agreed to accept data from the Trader Handbook in a similar way to that from Glass's Check Books for vehicle dating purposes.

Use of V888 for Historic Research

I mentioned in my notes in the last Newsletter that DVLA are no longer able to provide the registration history of a vehicle for research purposes in response to a V888 request. This was discussed further with DVLA who confirmed that the advice they received as a Government Agency was that this disclosure of personal data will not be permitted under the General Data Protection Regulation and thus they have no choice in the matter. This is in line with FBHVC's understanding of the Regulation and while the demise of this service is a regrettable loss to the historic vehicle community, it is unfortunately unavoidable.

Age Related Registrations – Format

DVLA explained that when selecting age-related registrations for issue to historic vehicles they always take the first date that a particular format of registration mark was available as the start date for that format, even though in period changes tended to be phased in across the country due to some areas registering more vehicles than others. They also reminded us that they work on one batch of unissued VRMs at a time and are not able to allocate them by area. This does mean that they are unable to accept our longstanding request that they extend the date after which registrations issued will consist of numbers before letters.

Q Plate Matters

In addition to the use of Q plates for radically altered vehicles which do not pass the 'Eight Point Rule', if it is not possible to provide satisfactory proof of age for a vehicle or if the history of a vehicle is unclear a Q plate is issued. It has always been the policy that any appeal against the issue of a Q plate must be made by the registered keeper no more than one year after its issue. However over a period of time these restrictions have been relaxed.

DVLA have now formally advised that the appeal period will be strictly enforced. This is partly due to the fact that for some of the older issues there are no records of the reasons for the decision which makes their review almost impossible. Whilst completely understanding that situation FBHVC stated that some Q plates were originally issued for convenience and keepers may now wish to change them. Discussions on this aspect continue.

In reply to a question DVLA clearly stated that after 40 years a Q plated vehicle is entitled to become 'historic'. The first Q plates were issued in 1983, so assuming the current rules continue, 2023 will be the first year a Q plated vehicle becomes eligible for the historic tax class and nil Vehicle Excise Duty.

DVLA Sections and Post Codes

First registration applications for an age related number
(imported vehicle, or 'found vehicle' with no known previous GB registration number)

First registration team
DVLA
Swansea
SA99 1BE

V765 and Reconstructed classic applications

K&R
DVLA
Swansea
SA99 1ZZ

Changes to a registered vehicle
(including date of manufacture)

CCU
DVLA
Swansea
SA99 1BA

- K&R is Kits and Rebuilds
- CCU is Central Capture Unit