

Registering Historic, Classic, Rebuilt Vehicles and Vehicles Converted to Electric – Response from the National Caravan Council (the NCC)

Introduction

The NCC is the trade association representing the caravan and motor caravan industry in the UK. Membership comprises manufacturers of all four caravan products: touring caravans, motor caravans, holiday caravans and holiday lodges and residential park homes (mobile homes/residential caravans) and owners and managers of touring caravan and motor caravan retailers/dealerships, suppliers and service providers to the industry and residential and holiday parks.

For the purposes of this response we are representing manufacturers, retailing dealerships, suppliers and service providers of motor caravans which includes vehicles marketed as campervans.

Executive Summary

1. The NCC welcomes the DVLA's Call for Evidence on Registering Historic, Classic, Rebuilt Vehicles and Vehicles Converted to Electric. This consultation is critical to ensuring that the registration processes for vehicle categories concerning our members are modern, efficient and aligned with the highest safety and environmental standards that we collectively work toward.
2. The NCC is committed to providing input to the DVLA that supports the development of a balanced framework that benefits our members, keeps our roads safe, and safeguards consumer interests.
3. While we have not provided specific responses to all sections – namely 'Historic and Classic Vehicles', 'Reconstructed Classic Vehicles', 'Restored Vehicles', 'Kit-Built and Kit Converted Vehicles', and 'Vehicles Converted to Electric Propulsion' owing to limited member interest in these areas – we emphasise the importance of ensuring that any new registration processes are clear, efficient, and do not impose undue burdens on members following safe and lawful practices for motor caravan conversions and re-registration.
4. It is crucial that the DVLA's guidelines for rebuilt and radically altered vehicles ensure they meet stringent safety and environmental standards. This includes clear definitions and criteria for what constitutes a radically altered vehicle and the necessary safety checks required post-conversion.

5. The NCC is increasingly concerned with the number of potentially unsafe vehicles on the roads that have bypassed type-approval and have ignored the DVLA's registration processes. These vehicles have undergone radical alterations putting consumers and other road users at risk, for example, the unsafe installation of additional passenger seats. The NCC insists on clamping down on unsafe practices, maintaining rigorous safety and compliance checks, e.g. a simple IVA assessment, for commercial vehicles designed for the carriage of goods that have been converted to motor caravans, mini busses etc.
6. Our substantive response to this Call for Evidence is therefore centred around questions 3.29 – 3.32 – Radically Altered Vehicles, questions 3.36 – 3.39 – Q and QNI Registration Numbers, questions 3.40 – 3.43 – Allocation of DVLA VIN, and the remaining questions at 4.1 and 5.1 on international practices and Independent Advisory Groups respectively.
7. The NCC calls for enhanced collaboration between the DVLA and industry stakeholders, in the form of an 'Independent Advisory Group for Radically Altered Vehicles' to ensure the continuous improvement of registration processes and compliance with safety standards, avoiding any unintended consequences for our industry.
8. We also call for greater monitoring and data collection on the impact of these registrations to ensure they remain relevant, compliant and effective in addressing industry and consumer needs and support law enforcement taking unsafe vehicles off the roads.

Questions – Historic and Classic Vehicles

3.1. *What do you consider to be a historic or classic vehicle? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.2. *If you think there should be a separate registration process for historic and classic vehicles, what would be the right process for these vehicles? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.3. *If you think there should be a series of registration numbers specifically for historic and classic vehicles, how do you imagine this would work? Please provide evidence and reasons to support your views.*

The NCC offers no responses to this question.

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? If so, please provide evidence and reasons to support your views.*

The NCC offers no responses to this question.

3.5. *Should there be a distinction made between restoration, where an existing registered vehicle with an established history is being refurbished, potentially with some new parts, and vehicles constructed as a replica not based on a registered vehicle, but constructed from a collection of old parts? If so, please provide evidence and reasons to support your views.*

The NCC offers no responses to this question.

Questions – Reconstructed Classic Vehicles

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

The NCC offers no response to this question.

3.7. *What do you think should be the definition of a reconstructed classic vehicle? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.8. *If you think it's appropriate to ensure the components used to build a vehicle must be more than 25 years old and within the period the model of vehicle was originally manufactured, please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.9. *Do you think the reconstructed classic scheme should be specific to vehicles not previously registered, or should the scheme also apply to already registered vehicles that have been rebuilt or restored? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.10. *What do you consider to be a replica vehicle as opposed to a reconstructed classic or historic vehicle? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

Questions – Rebuilt Vehicles

3.11. *What do you think should be the definition of a rebuilt vehicle? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.12. *Do you think the current guidance is still relevant? For example, does it take into account emerging technologies and innovation. If so, please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.13. *If you think there should be separate rebuilt policies for different vehicle types (motorcycles, cars, vans, etc), please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.14. *To what extent should a vehicle be rebuilt before DVLA needs to be informed? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

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? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

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? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

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, please provide evidence and reasons to support your views.*

It is vitally important for a consumer purchasing a vehicle to be aware of any major rebuild or restoration work that has taken place. Furthermore, consumers should have absolute certainty that any such work has been completed by approved specialists in the interests of individual and road safety.

The increasing popularity and demand for 'campervans' and 'motorhomes' over the last decade has led to over 100 small businesses offering commercial van conversions post-registration. These businesses are not using homologation engineers or have any form of approvals for the work they have conducted because they are using the 'type-approval bypass' method. This fundamental change of use is not being reported to DVLA since they created their own definition of a motor caravan to reduce the bureaucracy for the many thousands of applications they were receiving each year.

Questions – 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? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.19. *What do you think should be the definition of a restored vehicle? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.20. *If you think there should be separate policies for different vehicle types (motorcycles, cars, vans, etc), please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

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? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

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, please provide evidence and reasons to support your views.*

Please refer to NCC response outlined in section 3.17 and 3.38.

Questions – 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.*

The NCC offers no response to this question.

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.*

The NCC offers no response to this question.

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.*

The NCC offers no response to this question.

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.*

The NCC offers no response to this question.

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.*

The NCC offers no response to this question.

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.*

The NCC offers no response to this question.

Questions – Radically Altered Vehicles

3.29. *What do you think should be the definition of a radically altered vehicle and why? Please provide evidence and reasons to support your views.*

A radically altered vehicle should be defined as a vehicle that has undergone significant modifications from its original design, purpose, or configuration, resulting in a change of its category or function. The NCC considers, in the case of post-registration commercial van conversions, that a vehicle should be considered ‘radically altered’ at the point when a vehicle originally designed for the carriage of goods is converted for the purpose of the carriage of passengers.

The legal definition of a motor caravan is set out in Annex I (5.1) of Regulation (EU) 2018/858 of the European Parliament and Council, and reflected in the British Standard/European Norm EN13878 Leisure Accommodation Vehicles – Terms and Definitions Clause 3.24, which states:

“Motor Caravan means a special purpose ‘M’ category vehicle constructed to include accommodation which contains at least the following equipment: seats and table, sleeping accommodation which may be converted from seats, cooking facilities, and storage facilities.

This equipment shall be rigidly fixed to the living compartment; however, the table may be designed to be easily removable.”

The UK motor caravan industry considers a motor caravan – also referred to as a ‘campervan’ or ‘motorhome’ – as a leisure accommodation vehicle built on a chassis cab in ‘N1’ or ‘N2’ category with a coach-built body added, or a panel van which may be an ‘M1’, ‘N1’ or ‘N2’ category vehicle, fitted with habitation equipment to convert it into a motor caravan.

In short, all motor caravans are derived from ‘N’ class commercial vehicles, with the alcove, semi-integrated or fully integrated component added at a later stage. The vehicle is then either first registered or re-registered with the DVLA as an ‘M’ class passenger vehicle.

These leisure accommodation vehicles must have a minimum level of habitation equipment as defined in both European Directives, European Safety Standards, and British Standards. ‘Motorhomes’ are defined as Special Purpose Vehicles, in accordance with the Individual Vehicle Approval (IVA) Manual for Vehicle Category M1 (Passenger Vehicles).

The NCC considers the existing DVLA guidance to be both outdated and over-engineered. Currently, DVLA checks to facilitate re-registration on a V5 are based on a definition that lacks a foundation in European or British legislation. In 2019, DVLA guidance was updated to include motor caravan criteria as follows:

- a. Motorcaravans should have at least 2 or more windows on at least one side of the body.
- b. Motorcaravans should have specific Motorcaravan graphics.
- c. Motorcaravans must have an awning rail fitted.
- d. Motorcaravans cannot be fitted with elevating roofs.

However, current DVLA guidance on the re-registration process for commercial and passenger vehicles is drafted in a way that makes it unclear whether some or all of the requirements are necessary to meet their 'standalone definition' of a motor caravan.

This ambiguity is problematic and, when considering the safe and lawful market for motor caravans, some factory produced motor caravans that are first registered a 'M' class SPVs do not have two windows on at least one side, nor are they produced with specific motor caravan graphics. The majority of factory produced motor caravans do not have an awning rail whereas the majority do have elevating roofs.

These additional criteria are unnecessary and fail to address the most fundamental aspect of motor caravan conversions: safety.

The NCC's primary concern is that no checks are made to ensure the conversion of a commercial van to a 'campervan' does not affect the overall safety of the vehicle. This major policy oversight is putting lives at risk.

Under existing DVLA guidance no evidence is required to prove a converted 'campervan' is in a safe condition i.e., appropriate installation of habitation equipment (gas and electrical) or ensuring modifications have not invalidated base vehicle type approval (addition of extra passenger seats, their fixing method and the seat belts).

The DVLA has placed a greater emphasis on the visual appearance of graphics for the purpose of law enforcement vehicle identification rather than the absolute safety of individuals and road users.

It is the NCC's view that DVLA guidance must include a legal safety approval e.g. an IVA before the body code can be re-registered from a commercial van to a motor caravan.

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

No – current guidance is not fit for purpose as the term ‘radically altered’ is not defined in the guidance. There is a lack of clarity surrounding the term, which could extend from small modifications such as changing the wheels or tyres from the original specification all the way through to major conversion work.

It is the NCC’s view that the term ‘radically altered’ must surely be applicable where a vehicle’s use has been radically altered, for example, converted from an ‘N’ class commercial vehicle (carriage of goods) to an ‘M’ class ‘campervan’ (carriage of passengers).

3.31. *To what extent should a vehicle be radically altered before DVLA needs to be informed? Please provide evidence and reasons to support your views.*

The NCC considers that the DVLA should be informed as soon as a vehicle originally designed for the carriage of goods is converted for the purpose of carriage of passengers e.g. a minibus or motorcaravan etc.

Under existing DVLA policy, some convertors are avoiding DVLA re-registration because there is no effective mechanism to ensure that they meet Type Approval requirements, and there is no penalty for non-compliance as long as the ‘conversion’ meets the basic DVLA guidelines. Enforcement falls to the Police, who lack adequate resources to stop and check *all* commercial vans. Moreover, changes to the re-registration process and policy have inadvertently stifled honest attempts to re-register converted commercial vans.

The DVLA has been aware of this issue for several years, and the NCC has continually raised concerns at an Official level. By knowingly allowing thousands of conversions to bypass type approval, the DVLA is neglecting its duty to ensure road safety and protect future purchases when modifications are made to vehicles.

The risk is significant. It is only a matter of time before a commercial van used as a ‘campervan’ that is unsafe, has been mis-sold, incorrectly insured and incorrectly registered is involved in a serious road traffic incident. The current DVLA approach is a threat to life and must be revised immediately to ensure that radically altered vehicles are re-registered as soon as practicable, with appropriate safeguards in place to certify Type Approval and/or IVA safety standards.

The NCC recommends that the following radically altered policies be introduced by the DVLA at the point of re-registration, and that the 2019 amendments to the guidance outlined in 3.29 be removed:

Individual Vehicle Approval (IVA)

Under existing practice, where a consumer converts their own private vehicle to a motor caravan, they should have an IVA performed to ensure that the conversion has not compromised the vehicle's safety on the road. For individual owners, an IVA costs £100 and is issued by the Vehicle Certification Agency (VCA).

Independent convertors will have fitted additional passenger traveling seats and apertures cut in the side of the vehicle to install windows, which need to be checked for compliance with road vehicle safety requirements. The NCC firmly believes that IVAs should also include a gas and electrical installation certificate where these features have been added and we are keen to engage with Officials to introduce this additional safety feature.

Small Company Conversion

Where a small company undertakes a conversion, it should be mandatory to have every vehicle approved by an IVA or have gained accredited convertor status from the NCC. To obtain accredited status, the company should have presented its vehicles for an annual check conducted by the NCC to ensure conversion practices do not affect the safety of the vehicle and habitation areas comply with all necessary EU and UK safety standards for motor caravans.

These recommended policies will ensure that all commercial van conversions meet stringent safety standards currently required for purpose-built motor caravans, thereby protecting both individuals and other road users, while also providing clear guidelines for lawful and safe motor caravan operation.

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? If so, please provide evidence and reasons to support your views.*

No – The NCC does not consider focusing primarily on modifications to the chassis or monocoque bodyshell to be appropriate for assessing a radically altered vehicle.

Adding passenger seats, seatbelts and seatbelt anchorage points must for the safety of occupants be considered as a radical alteration.

Rather than concerning the re-registration process with irrelevant external details such as vehicle graphics, the DVLA should uphold their commitment to maintaining road safety and amend their guidance to focus on any internal changes that radically alter the functionality of the vehicle and its operational integrity.

The current emphasis overlooks critical aspects of vehicle conversions, particularly in the motor caravan market. The NCC is aware that vehicles that have not been classified by the DVLA as motor caravans are currently being insured as a motor caravan because insurance companies accept the consumers opinion that it is a motor caravan. In such cases, no visual modifications to the chassis or monocoque may have been made; however, internally an array of living amenities may have been installed.

It is the NCC's view that only vehicles registered as a Type Approved motor caravan should be insured as such. In the event of a claim, the NCC is concerned that insurance companies may use this fact as a way not to pay out, in addition to opening the customer to criminal prosecuted for not having the correct insurance.

It would not be considered acceptable for an insurance company to cover a motorcycle as a motorcar because the customer said it was a motorcar. It is wrong in principle that poor practice from unlawful individuals/convertors and convoluted DVLA policies is devaluing the motor caravan industry.

A more comprehensive assessment for vehicle modifications should include any or all of the established legal definition requirements of a motor caravan namely: *seats and table, sleeping accommodation which may be converted from seats, cooking facilities, and storage facilities.*

See further comments regarding speed limits as outlined in our response to Q3.38.

Questions – Vehicles Converted to Electric Propulsion

3.33. *If you think there should be a separate, specific policy for assessing vehicles that have been converted to electric, what would that policy or process look like? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.34. *If you think there should be specific safety tests for vehicles which have been converted to electric, what should these tests involve? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.35. *At what point should a chassis or monocoque bodyshell modification (or frame for motorcycles) affect the identity of the vehicle that has been converted to electric? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

Questions – 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, please provide evidence and reasons to support your views.*

Yes – Where the identity is unknown or cannot be determined, only vehicles that meet the criteria should be given a Q plate where possible. The original registration plate should be retained to keep traceability to support law enforcement.

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? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

3.38. *If you consider it important for a consumer purchasing a vehicle to know if it's been modified, please provide evidence and reasons to support your views.*

The NCC is increasingly concerned that changes to DVLA policy on the definition of a motor caravan is not only fuelling anti-competitive behaviour in the sector but also driving the sale of thousands of potentially unsafe 'DIY' post-registration converted commercial vans.

According to DVLA data, in 2018 4,701 panel motor caravans and 9,990 other types of motor caravans sold at first registration complied with UK and EU safety standards. In contrast, an estimated 21,215 potentially unsafe converted motor caravans were not re-registered. Since 2019, data on these conversions is no longer reliable or readily available due to changes in DVLA policy on motor caravan definitions and re-registration processes.

The global 'campervan' market has grown exponentially over the past five years, partly due to changes in consumer preferences following the COVID-19 pandemic. In 2020/21, data obtained from DVLA recorded over 16,500 motor caravans were registered with the DVLA, an increase of 8.25% on pre-pandemic levels. This data only includes motor caravans and converted commercial vans that have been correctly registered/re-registered and meet EU/UK Type Approval, and recognised safety standards, such as those manufactured by NCC manufacturer members.

Based on wider market trends, it is highly probable that the sale of potentially unsafe converted commercial vans has also increased significantly.

Consumers typically lack the technical knowledge to distinguish between legally compliant and non-compliant vehicles. It is unreasonable to expect consumers to be fully versed in the legal technicalities regarding the safe and lawful definition of a motor caravan and/or a converted vehicle. When purchasing a converted 'campervan' from what appears to be a reputable retailer, for example, they do so with the peace of mind that the vehicle they are purchasing is safe and correctly registered. However, this is no longer guaranteed, and lives are being put at risk.

It is also important to consider the Consumer Rights protection afforded to consumers purchasing these vehicles, and the legal responsibility placed on traders for ensuring the market is safe and legal. With the rise in potentially unsafe converted motor caravans in the marketplace, reputable retailers may be in breach of trading and safety standards unknowingly.

The fundamental distinction between an 'N' class commercial vehicle and an 'M' class passenger car / M1SA motor caravan is that the former is only registered for the carriage of goods, not passengers.

An unknown number of these potentially unsafe vehicles are being sold, with a market value of £1.1 billion (2018), without GB Type Approval (previous EUWVTA) – or the lesser UK National Small Series Type Approval (NSSTA) – safety standards.

The NCC considers the safety of customers and other road users to be upmost importance. Therefore, post-registration re-registered conversions of commercial vans should therefore be considered a ‘radically altered’ vehicle’ and treated accordingly. The DVLA definition must align with EU and UK legal definitions of motor caravans to avoid confusion for reputable retailers and to maintain fair market practices.

Clarification on Speed Limits

Commercial vehicles have lower speed limits on roads where the national speed limit applies compared to motor caravans, unless the unladen weight exceeds 3050kgs. The permitted speeds usually exceed those for commercial vehicles. Therefore, the NCC argues that only vehicles that have had the body code on the V5 registration form changed to motorcaravan should be eligible for the higher speed limit. This would make traffic enforcement simpler and remove the ability for owners to claim their vehicle is a motor caravan when facing a speeding penalty in a commercially registered vehicle.

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? If so, please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

Questions – Allocation of DVLA VIN

3.40. *In what circumstances do you think DVLA should allocate a VIN? Please provide evidence and reasons to support your views.*

The NCC considers a DVLA VIN should only be allocated in circumstances where there is no other VIN available. For radically altered vehicles, where an original VIN remains, this must be used to ensure traceability of the vehicle can be maintained.

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? Please provide evidence and reasons to support your views.*

The NCC offers no response to this question.

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? Please provide evidence and reasons to support your views.*

Motor caravans that are lawfully manufactured with alcoves, semi-integrated or fully integrated units must hold GB Type Approval (previously EUWVTA) or UKNSSTA, obtained in close collaboration with base vehicle manufacturers. For commercial van conversions, the NCC strongly advocates that any re-issuance of a VIN should only be approved by the original vehicle manufacturer. This should be supported by either an individual IVA or a specialist convertor who has obtained Type Approval for bespoke conversions.

Volkswagen have recently launched their Volkswagen Commercial Vehicles Motorhome Qualification Scheme which includes having their vehicles meet legal type approval standards, allowing first registration as a ‘campervan’ or ‘motorhome’, not merely as a panel van. The scheme, supported by the NCC’s Manufacturing Accreditation Scheme, provides consumers with additional peace of mind that conversions comply with EU and UK safety standards.

The NCC recommends that any subsequent DVLA guidance on the alternation of VINs should not facilitate a market where potentially dangerous convertors can by-pass stringent manufacturer safety standards. Allowing unapproved modifications and VIN re-stamping poses significant safety risks. In the event of a serious incident involving a converted ‘campervan’, the consequences would not only reflect poorly on the NCC, DVLA, and the original base manufacturer but also undermine safety standards that could lead to potential significant liability claims.

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? Please provide evidence and reasons to support your views.*

No – In circumstances involving motor caravans fitted with NCC VINCHIP™, the original vehicle VIN can be scanned using relevant technology, making the DVLA VIN redundant. The NCC considers the original vehicle VIN to be maintained unless in exceptional circumstances.

Questions – What Other Countries Do

4.1. *Do you think there is any best practice from other countries that could be implemented here? Please provide evidence and reasons to support your views.*

Australia

As with the UK, the process for converting a commercial vehicle into a motor caravan in Australia is heavily regulated and requires compliance with specific standards and inspections to ensure safety and legal conformity.

The Vehicle Standards Bulletin 14 (VSB 14) has been prepared by members of the Australian Motor Vehicle Certification Board Working Party in consultation with industry, user groups, government agencies and individuals with an interest in modifying light vehicles and/or building individually constructed light vehicles (ICVs).

VSB14 is a live document that is under continuous review. It is effectively a national Code of Practice outlining the standards for light vehicle modifications, including camper van conversions. It covers requirements for structural changes, installation of living accommodations, and safety systems such as gas and electrical installations.

In addition to VSB14, each State has additional requirements. For example, in New South Wales (NSW), you need a compliance certificate from a licensed engineer confirming that the conversion meets motor caravan standards, including adequate ventilation, proper installation of electrical systems by a licensed electrician, and compliance with general vehicle safety standards. The vehicle must be inspected and weighed, and modifications must not compromise the vehicle's roadworthiness.

Converted vehicles must also be reclassified and registered as 'motorhomes' or 'RVs'. This process involves thorough inspections to ensure all modifications comply with safety and construction standards, including verifying that at least two-thirds of the vehicle's floor area is no longer suitable for carrying goods, thus ensuring the vehicle's primary function is habitation.

New Zealand

In New Zealand, the conversion of commercial vehicles into camper vans also requires adherence to stringent regulations. All modified vehicles must undergo 'Vehicle Compliance Certification' to ensure they meet the necessary safety standards. This includes checking structural modifications, the installation of fixed seating, sleeping facilities, cooking facilities, and storage units. Conversions must also comply with New Zealand's Land Transport Rules, which cover vehicle standards, including occupant protection, vehicle lighting, and other critical safety features.

For ‘campervans’, it is often necessary to obtain a ‘Self-Containment Certification’, which ensures that the vehicle has sufficient facilities for managing waste, including a fitted toilet, fresh water supply, and wastewater containment, in line with New Zealand Standard NZS 5465:2001. While not directly linked to converted commercial vans, these regulations ensure that converted camper vans in both Australia and New Zealand are safe, legal, and suitable for habitation, reflecting a commitment to maintaining high safety standards for all road users.

Questions – 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? Please provide evidence and reasons to support your views.*

The NCC recommends that the DVLA establish an Independent Advisory Group (IAG) for radically altered vehicles to strengthen links between Government and our industry expertise to avoid unintended consequences of policy development.