

20 March 2026

Total Mobility Consultation
Ministry of Transport
Email to:
totalmobilityreview@transport.govt.nz

Horizons Submission – Review of Total Mobility

This submission is made on behalf of the Horizons Regional Council (Horizons), with advice from the Horizons Passenger Transport Committee (PTC).

The PTC oversees public transport policy and investment across the Manawatū–Whanganui region. The Regional Public Transport Plan 2022–2032 (RTP) sets a vision for an attractive, integrated and convenient public transport system that connects people, places and opportunities, enhances wellbeing and the environment, and supports equitable access. Total Mobility is a critical part of this network, enabling more than 7,500 registered users across Palmerston North, Whanganui, Levin, Feilding and Marton to access essential services, maintain independence and participate in community life.

Horizons, like all authorities who manage Total Mobility, have seen a significant increase in the use and cost associated with delivering the scheme. Over the past two years, the number of trips taken on the scheme has increased by almost 20%. The subsidy cost to deliver the scheme in the Horizons region has increased by more than 10%.

This submission responds to each proposal in the Ministry of Transport discussion document. For each, we submit whether we are in support or do not support the proposal.

We note that outside of these proposals, there are changes being made by Government to the Total Mobility scheme to reduce the level of subsidy from 75% to 65% and reduce fares caps by around 10% nationally. The number of trips taken and cost associated with the Total Mobility scheme in the Horizons region has increased significantly over the past few years. We consider that this was primarily as a result Government increasing the fare subsidy level from 50% to 75%. This has placed significant pressure on local ratepayer funding for the scheme. Horizons have had to increase the level of rates collected to fund our portion of the Total Mobility scheme significantly over that period.

We are supportive finding an appropriate balance between users, Government & NZTA and local share for the funding of the Total Mobility scheme. Horizons Council will consider any changes to the regional fare cap, or not, at their meeting later in March 2026.

Proposal 1 — Setting a clear purpose statement

Horizons support reviewing the purpose statement for Total Mobility.

Horizons consider the proposed wording to be overly narrow. A simpler purpose statement would better provide clear direction for Total Mobility. We suggest the following wording for this is “To provide subsidised transport services to disabled people, to support them to live their lives.”

Rationale: Our proposed statement keeps the purpose high-level and focused on mobility, dignity and independence. By changing the focus from ‘mobility services’ to ‘transport services’, it also provides opportunities to consider public transport or community transport in the suite of options to support Total Mobility clients. Operational detail, such as qualifications around public transport or other matters, should sit in policy and guidance, not the purpose statement.

Proposal 2A — Evidence requirements for assessments

Horizons support increased national consistency and clearer guidance for Total Mobility assessment. Assessments should be undertaken by assessment agencies, which could include councils, with professional advice used where appropriate.

Important: Requirements must remain accessible and proportionate in rural/provincial contexts to avoid new barriers for applicants (e.g., travel costs and delays to obtain specialist evidence).

Proposal 2B — Periodic reassessments

Horizons do not support the use of periodic reassessments as proposed.

Horizons submit that most Total Mobility clients should not require reassessment to remain on the scheme. For most users of the scheme, their disability is permanent and will not improve over time. Mandatory periodic reassessments would impose high administrative burden on councils and unnecessary stress on users.

Horizons do consider that reassessments can be a useful tool in managing the Total Mobility scheme for some users. We submit that this should be the exception, rather than the rule. Clear guidance could be provided around what circumstances reassessment would be appropriate based on disability, mobility issues or age.

Proposal 3 — Introducing trip caps

Horizons do not support the introduction of trip caps.

The Total Mobility scheme is designed to meet the needs of eligible users irrespective of frequency. Those who use the scheme often already contribute significant personal cost. Trip caps based on individual circumstances would create administrative complexity and would be difficult to enforce consistently. It would limit transport options for those on the scheme who rely on it for their regular travel.

Horizons recognise that most users use the Total Mobility scheme less than the proposed trip cap limits. Approximately 14% of user-months are 20+ trips and approximately 3% of user-months are 40+ trips. Horizons submit that flat caps would directly constrain a small share of users but remove a disproportionate share of essential trips concentrated in high-need months—reducing equity while adding administrative load. On top of other changes to fare subsidy and caps, this could place a significantly greater financial burden on these users.

Proposal 4 — Incentivising wheelchair-accessible vehicles

Horizons support measures to increase the availability and incentives regarding wheelchair-accessible vehicles (including reviewing hoist-trip payments). We note availability is not currently a significant constraint within the Horizons region, but support equity of access nationally.

We submit that vehicles must meet the safety and accessibility standards required. Beyond just the vehicles, drivers must be provided with the training required.

Proposal 5 — Enabling new service providers

Horizons support enabling more provider types (including community transport and on-demand). Providers must meet accessibility, safety and customer-care standards appropriate for delivering the Total Mobility scheme. We consider that providing a greater number of transport options to

Total Mobility users will enhance their mobility opportunities while best utilising existing investment in public transport.

We submit that bookings need to remain accessible to users. Options need to remain available to those who would like to book via the phone and should not be fully replaced by online or app bookings.

Proposal 6 — National public transport concession

Horizons support the introduction of a national public transport concession for people with disabilities. Horizons already operates a disability concession linked to Total Mobility eligibility. A national scheme would improve consistency and complement, not replace, Total Mobility.

Summary of recommendations

- Adopt a broader purpose statement focused on supporting disabled people's mobility.
- Improve national consistency of assessments with accessible, proportionate evidence requirements.
- Enable targeted (not routine) reassessments.
- Do not introduce trip caps due to equity and feasibility risks.
- Enhance incentives for wheelchair-accessible vehicles.
- Enable a wider range of providers with appropriate safeguards.
- Implement a national disability concession alongside Total Mobility.

Thank you again for the opportunity to provide feedback on this important review.

Horizons do not wish to be heard in support of this submission. For any clarification, please contact Mark Read, Manager Transport Services, on 0508 800 800 or via transport@horizons.govt.nz

Yours sincerely,



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Chair
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Copied to:

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