



/03/2026

Total Mobility Consultation
Ministry of Transport
PO Box 3175
Wellington 6140

Emailed to: totalmobilityreview@transport.govt.nz

Submission from the Manawatū District Council on Proposals to Strengthen Total Mobility

Dear Sir/Madam

The Manawatū District Council (MDC) thanks the Ministry of Transport for the opportunity to provide feedback on the proposals to strengthen Total Mobility.

General feedback:

The Manawatū District has a population of approximately 34,000, with just under half living in rural areas across 16 villages and rural communities. In response to transport challenges, the Manawatū Rural Bus was established as a not-for-profit, on-demand service connecting rural communities across the district. However, it currently does not meet the criteria required to participate in the Total Mobility Scheme. In rural areas, the availability of registered taxi services is limited, which can restrict access to the scheme for these communities.

While the Manawatū District Council does not provide a public transport service directly, we have a representative on both the Regional Public Transport Committee and the Manawatū Public Transport Governance Group. As at March 2025 there were 580 people registered for Total Mobility in the Manawatū District.

Across the Manawatū-Whanganui Region, 84.7% of Total Mobility users are aged 61 and over. This aligns with the Manawatū District's demographic profile, which includes a higher proportion of residents aged 65 years and older. Council emphasises that many of these residents are living on fixed incomes and have experienced sustained cost-of-living pressures in recent years. Any increases in transport costs will disproportionately affect this already vulnerable group and may limit their ability to access essential services, social connections, and community participation.

Council is concerned that the cost of the Total Mobility scheme has increased without prior consultation, particularly given the significant impact on residents aged 65 and over. Meaningful engagement with affected communities should occur before implementing changes of this nature. Consultation is especially important where policy

changes directly affect older people and those with disabilities, who may have limited capacity to absorb additional financial burdens.

Proposal 2: Make assessments fair and consistent:

Council supports greater consistency in eligibility assessments across the region. However, this must be implemented in a way that is transparent, well-communicated, and easy to navigate. Clear guidance must be provided to both assessors and applicants to ensure equitable outcomes. Any new assessment framework should prioritise accessibility, fairness, and the dignity of applicants.

Proposal 2A: Show evidence of your impairment:

While Council acknowledges the need for appropriate evidence to support eligibility decisions, we strongly caution against introducing processes that create additional financial or administrative barriers. Many Total Mobility users are already on limited incomes. Requiring further documentation, medical verification, or reassessment processes may inadvertently increase costs for those the scheme is designed to support. The scheme must remain accessible and not impose additional hardship.

Proposal 2B: Regular reassessments:

Council is particularly concerned about the potential for unnecessary reassessments. For individuals with permanent or non-changing disabilities, repeated reassessment would be both burdensome and inequitable. Clear guidance is required regarding whether such individuals will be required to undergo reassessment, and at what frequency. There are also associated transport costs involved in attending assessments. Frequent reassessment risks creating a “catch-22” situation, where individuals incur additional transport costs simply to maintain access to subsidised transport.

Council suggests that eligibility confirmation could be simplified by allowing a person’s general practitioner to indicate whether a mobility impairment is permanent or temporary. Where a condition is permanent, reassessment should not be required. This would reduce administrative and financial barriers for applicants.

Proposal 5: Allowing new providers:

Council encourages the inclusion of additional transport providers within the scheme. In the Manawatū District, the Manawatū Rural Bus Service provides a critical and affordable transport option for residents in isolated rural communities travelling to Feilding and Palmerston North. While the service is not currently wheelchair accessible, it plays an essential role in supporting access to services at a significantly lower cost than private taxi services. Expanding the range of approved providers would improve affordability, enhance accessibility, and better reflect the transport realities of rural communities.

Support for the Horizons Regional Council position

Council notes and supports the submission provided by Horizons Regional Council on the Total Mobility review. As the regional authority responsible for administering the Total Mobility scheme and overseeing public transport services across the Manawatū–

Whanganui region, Horizons provides an important regional perspective on the operation, funding, and future development of the scheme. Council supports the key recommendations outlined in the Horizons submission, particularly those relating to improving consistency in assessments, avoiding unnecessary reassessments for people with permanent disabilities, enabling a broader range of transport providers, and ensuring that any policy changes maintain equitable access to transport for people with disabilities.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Ford', with a long, sweeping underline that extends to the right.

Michael Ford

Mayor