

16 March 2026

Total Mobility Consultation
Ministry of Transport
PO Box 3175
Wellington 6140

Submission to Total Mobility Scheme: Proposals to strengthen the scheme

1. Thank you for the opportunity to provide feedback on the proposed changes to the Total Mobility Scheme.
2. The Kāpiti Coast district has a rate of disability higher than the national average at 8.6% of our population according to the 2023 census, compared to the national rate of 7.5%. The majority of Kāpiti's working population travel out of the district either south to Wellington or north to Levin in the Horowhenua District, or even further to Palmerston North, for employment, educational, health and social opportunities that are not readily available in our district. This results in a high demand for transport services to move to and from a destination and more so for those who have a disability that makes public transport often unsuitable.
3. For our disabled community, Total Mobility has proven highly valuable as it supports them to utilise transport options where public transport does not work for them either because it is hard to access or too expensive.
4. Overall, Kāpiti Coast District Council (Council) supports the need for national consistency and increased options. However, we are concerned that the proposed changes to the scheme will result in further hardship for Total Mobility users, reducing the dignity, and ability of disabled people to access a life that enables them to live to their full potential by adding unnecessary travel and administrative costs on vulnerable users particularly at a time when the cost of living is increasing.
5. This submission from Council has been informed by our Disability Advisory Group and Kāpiti Health Advisory Group. Given the significant effect that the proposed changes to Total Mobility are likely to have on our disabled community, Council's submission on Total Mobility is being made in addition to those being made by our Disability Advisory Group and Kāpiti Health Advisory Group.

6. We have provided feedback on each of the six proposals below.

Proposal 1: Set a clear purpose statement on Total Mobility

7. Council has concerns about the impact of the language changes in the new statement from “enabling access to transport options for disabled people so they can enjoy their lives” to “providing transport only if a disabled person is unable to access public transport”.

8. We are concerned that this will lead to more restrictive criteria (either explicitly or implicitly), excluding people the scheme has historically supported.

9. The new statement is also unclear about what “unable to access public transport” actually means. It carries a level of complexity and uncertainty that is open to different interpretations. It is important to ensure that there is a clear distinction between the terms ‘impairment’ and ‘disability’, in line with their use in the disability community. An impairment is a problem with how a part of a person’s body or mind works (e.g. blindness, a missing limb, or a cognitive condition) while a disability happens when that impairment meets barriers in the community or environment that would make everyday life harder. For example, someone who is deaf may not be significantly disabled, if their environment is designed with deaf people in mind (e.g. through widespread use of sign language, and consistent visual signs to help them navigate the world).

10. Difficulties in using public transport are often shaped by factors beyond a person’s impairment and may include - little or no public transport in the area, long distances to pick up or drop off points (e.g. bus stops), unsafe walking routes, or unsuitable pickup times.

For proposal 1, Council **recommends** that:

- Greater clarity in wording is needed to ensure that the purpose statement reflects the real world, day-to-day barriers disabled people face and maintains the scheme’s objective to support equitable mobility and community participation.

Proposal 2: Make the Total Mobility assessment fairer and more consistent

11. Council understands that the proposal does not change criteria for eligibility for Total Mobility but instead is to change how and when assessments are done. While we support the need to have a consistent national process, we are concerned that the changes will add further costs for users who already struggle with the cost of living and will create administrative barriers that will make it more difficult for people to apply for this scheme designed to support a disadvantaged community to live their lives. Most impairments that qualify for Total Mobility are permanent and some carry the potential to get worse overtime.

12. As with other support schemes that include assessment of ongoing disability, we note the importance of respecting the mana and dignity of those with disabilities, rather than establishing a practice that requires ongoing justification of need. This could lead to further barriers to equal participation in society, conflicting with the Human Rights Act 1993 and the United Nations Convention on the Rights of People with Disabilities.

For proposal 2, Council **recommends** that:

- The Government investigate how changes in people's circumstances could be captured by connecting this scheme to information already collected by other Government agencies (eg that collected by MSD for the purposes of disability benefits) rather than requiring users to pay and collect for documentation which already exists.

Proposal 3: Introduce caps on trips based on level of need and circumstances

13. Council **does not support** the proposal to introduce a cap on the number of trips that a user can take using Total Mobility. Feedback that we have collected from our Disability Advisory Group has been that the proposed introduction of a cap would significantly reduce access, increase inequality, and undermine the purpose of the scheme. We provide the following reasons for why the proposal is not supported:

- **A cap would severely restrict access to essential daily services.** A limit would be quickly exceeded by many users who rely on the scheme for essential travel such as work, medical appointments, community activities, and household shopping. People with multiple health needs or children requiring specialist care would also exhaust their allocation early, forcing them to miss appointments or stay home.
- **Kāpiti residents would be disproportionately impacted.** A capped scheme does not reflect the real travel needs of Kāpiti's disabled community. There are parts of the Kāpiti District – particularly around the rural and northern areas – that are not serviced by public transport and disabled people living in these areas often need to travel to Palmerston North or Wellington to access essential health services. The proposed caps would inhibit their ability to access such services and also move around the district for other needs.
- **A cap would increase isolation and reduce wellbeing.** Many disabled people must already choose between medical, work, family, and social commitments. A cap on Total Mobility trips removes flexibility and independence, especially for those who cannot use public transport at all. This could increase social isolation and vulnerability.
- **The proposal is inequitable and financially harmful.** Disabled people are more likely to be on low incomes or Government support and cannot afford full price taxis once their subsidy is used. A capped system benefits those with greater financial means while disadvantaging people with limited incomes. Such a limit is not imposed on non-disabled users of subsidised transport, such as students, over 65s, and beneficiaries, and raises questions of fairness for some of the most vulnerable of our community.
- **Administration of a capped system would be difficult and undignified.** Tracking trip numbers each month is burdensome, particularly for people with cognitive or intellectual impairments. Requiring people to also justify additional trips is seen as undignified and ableist and gives unnecessary power to assessors to determine which trips are “worthy” which would be counter to the purposes of Total Mobility.
- **Regional inconsistencies would worsen inequity.** Current fare caps vary widely across regions, from \$9 in Te Tairāwhiti to \$80 in Tāmaki Makaurau. A capped model risks leaving disabled people worse off depending on where they live as disabled people living on the West Coast would not have the same access to public transport and essential services as someone living in Auckland or Christchurch. National consistency is needed, not additional restrictions.
- **Risks to safety and accessibility would increase.** Many disabled people, including Deaf community members, rely on taxis due to safety or communication barriers, or because emergency

announcements are not accessible. Fewer subsidised trips increase safety risks and reduce independence

For proposal 3, Council **recommends** that:

- The Government reconsider this proposal +and focuses on the benefit that can be gained from the other changes proposed, such as increased provider options.

Proposal 4: Incentivise providers to provide more wheelchair accessible vehicles

14. Council **supports** the Government's proposal to encourage Total Mobility providers to offer more wheelchair accessible vehicles. Feedback from the Kāpiti Disability Advisory Group shows there is a major shortage of these vehicles, and many users struggle to find transport because there are too few suitable vehicles or not enough trained drivers.

15. In Kāpiti, this problem is made worse as some rural areas of the district have no public transport services at all. This leaves people who use wheelchairs with even fewer transport options.

16. Another concern is that non-disabled passengers sometimes use wheelchair accessible taxis. Drivers will often take the next available job to maintain their income, which means the limited number of accessible vehicles are not always available for the people who need them most. This results in longer wait times or situations where disabled people cannot secure a ride for essential daily activities.

17. While Council welcomes efforts to increase the number of accessible vehicles, these changes should not create extra requirements or costs for Total Mobility users. Council also notes that improvements are needed across the wider transport network, including disability awareness training for bus and rail staff and better accessibility overall.

Proposal 5: Enabling new service providers to enter the scheme

18. Council **supports** the proposal to allow new providers to join the Total Mobility scheme. Feedback from both the Kāpiti Disability Advisory Group and the Kāpiti Health Advisory Group shows there is strong demand for more provider options.

19. We note that in the Wellington region, nine taxi companies are approved Total Mobility providers, with three operating in Kāpiti. Many people rely on these services for essential trips such as medical appointments, community activities, and click-and-collect groceries. Increasing the number of providers would make the transport network more accessible and flexible for users. This is particularly important as we continue to grow as a Tier 1 growth area, as demand for such services will also increase with our growth in population.

20. Feedback also highlighted the potential benefits of including ride-share companies such as Uber in the scheme, particularly for disabled people who do not require a ramp or hoist. This would give more choice and improve affordability for many users not only in our district but also in the wider region.

For proposal 5, Council also **recommends** that:

- while expanding the number of providers is important, improving the accessibility and reliability of existing services is equally crucial. This extends to ensuring that drivers are properly trained to accommodate persons who have communication difficulties such as those who are deaf or blind.

Proposal 6: Introduce a national public transport concession for people with disabilities

21. Council **supports** the Government's proposal to explore a national public transport concession for disabled people. Disabled people make up over 20% of New Zealand's population, and a nationwide concession that improves access to public transport could make travel easier and reduce reliance on Total Mobility for everyday trips.

22. The discussion document notes that some regions offer discounted fares for disabled passengers, while others do not. A national concession would promote greater fairness and consistency across the country. It would also support people who need to travel between regions for essential services. This is especially important for disabled people living in the northern parts of our district, who often need to travel to Palmerston North for major health and social services.

23. The SuperGold Card programme, which provides free public transport for older people, is a good example of how a national concession can successfully encourage public transport use. A similar approach for disabled people could deliver the same benefits.

For proposal 6, Council also **recommends** that:

- the discount level must be set carefully. It should not be lower than what some regions currently offer, as this would leave disabled people in those areas worse off. A national concession should improve access—not reduce it—and it should not be seen as a replacement for Total Mobility, because both serve different purposes.

Thank you for the opportunity to submit on the proposed changes to the Total Mobility Scheme.

Nāku iti nei, nā



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