CITY BUILDERS ASSOCIATION
RŌPŪ HANGANGA TĀONE

AP-18 POSITION PAPER

Time of Use Charging in Auckland

What overseas experience tells us, and what CBA believes: charge the city centre first, and the motorways only once real alternatives are running.

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SUBMISSION TO
Auckland Council and Auckland Transport, "Time of Use Charging in Auckland", open 11 November to 11 December 2026

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Charge the city centre first. Motorways later, and only once the alternatives run.

Council is consulting on three ways to charge drivers at peak times. The evidence from overseas says pricing works. Council's own modelling says the small option barely moves congestion and the big one leaves some drivers worse off. CBA backs a staged path.

1 **Yes in principle, on conditions.** CBA supports time of use charging as a demand management tool [13, 16].

2 **City centre first.** Begin with a city centre cordon: Option A, or Option B if hospital access, Gillies Avenue and SH16 diversion issues can be resolved.

3 **Motorways later, and only with alternatives.** Core motorway charging (Option C) should come only as a separate, consulted variation, once named rapid transit alternatives for those corridors are funded and running [11, 13].

4 **Overseas evidence backs pricing.** Established schemes cut traffic across the boundary by roughly 11% to 22%, and congestion by more. Support usually rises after launch, but falls when revenue is tied to a contested project [18, 22, 24, 30, 31].

5 **Conditions that make it work.** A daily cap, ring-fenced revenue, parking controls on boundary streets, an impact assessment covering local streets, retail, freight and the hospital, and a two-year review [13, 14, 16].

4% vs 28%

Cut in congested driving on the isthmus and lower North Shore: Option A against Option C

Source: 1

$2.6b

Council's estimate of what congestion costs the economy

Sources: 1, 5

~14%

Uncharged drivers who get a slower trip under Option C, because of diversion

Source: 3

2030–31

When charging could start, at the earliest

Source: 1

OUR ASK

Adopt a staged, city-centre-first approach, and publish revenue, operating cost and modelling estimates for every option now.

Submissions close 11 December 2026. Our 23 detailed asks, mapped to Council's feedback form, are in section 05.

Policy paper, 12 November 2026. City Builders Association Limited, Rōpū Hanganga Tāone. Contact: Mark Pervan, Founder and Director. Figures are cited by number to the sources on the final pages.

THE PROPOSAL

01 What Council proposes

Auckland Council and Auckland Transport (AT) are asking for feedback on three time of use charging options. Council's own modelling shows a large gap between them: the smallest scheme barely moves congestion, the largest moves it a lot but leaves some drivers worse off.

The three options are a city centre cordon (**Option A**), a wider city fringe cordon (**Option B**), and the city centre plus core motorway sections between the Harbour Bridge, Point Chevalier and Mount Wellington (**Option C**) [1]. The options were narrowed from 13 to three [2].

Council states that regular commuters lose an average of 66 hours a year in traffic, that Aucklanders collectively lose around 29 million hours a year, and that congestion costs the economy an estimated $2.6 billion [1]. The underlying January 2025 white paper breaks the $2.6 billion into $1.9 billion in time delays plus more than $700 million in macro-economic costs, by 2026 [5].

66 hrs
Average time a regular commuter loses in traffic each year
Source: 1

29m hrs
Time Aucklanders collectively lose to congestion each year
Source: 1

$2.6b
Estimated cost of congestion to the economy ($1.9b delay, $0.7b+ macro-economic)
Sources: 1, 5

EXPLAINER

What is time of use charging?

Council describes it as "a charge to use certain roads when they are busiest", so that "some people choose to use public transport, carpool or travel at a different time of day" [1].

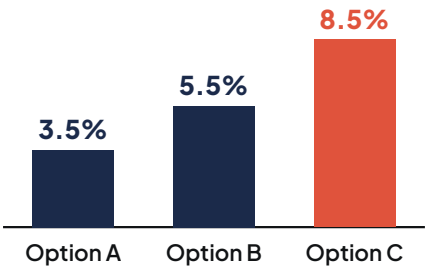
Council's FAQ states that the primary purpose "is to reduce congestion, not raise revenue" [1].

Charges would generally apply on weekdays when **entering** the charged area from 7am to 10am, or **leaving** it from 3pm to 6pm. Modelled charges range from $2 to $7 [1].

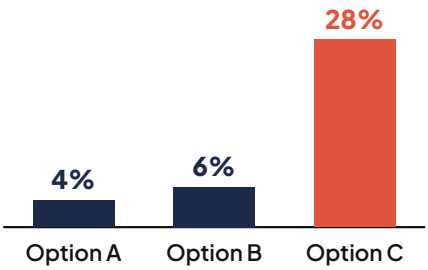
Bigger schemes charge more trips and deliver far more relief

Council modelling of the three options, morning peak

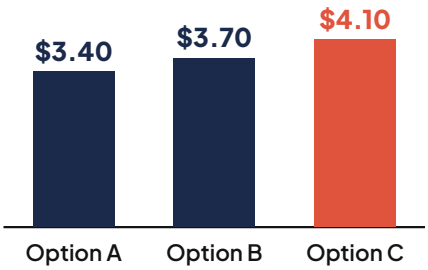
Share of AM peak trips charged



Cut in congested driving
Isthmus and lower North Shore



Benefit per dollar invested



Source: 1. Option C also leaves around 14% of uncharged drivers with a slower trip because of diversion [3].

The three options, as published

	Option A: City Centre Cordon	Option B: City Fringe	Option C: City Centre and Motorways
What is charged	Crossing into the cordon in the morning rush and leaving in the afternoon rush. Motorway trips and travel within the cordon not charged [1]	As Option A, expanded to commercial areas and some neighbourhoods next to the city centre. Parnell and Ponsonby to be investigated [1, 3]	Crossing into the city centre or travelling on congested core motorway sections. Only one charge from motorway into city centre [1, 3]
Time saved by paying drivers	Around 2.5 minutes [1]	Around 4 minutes [1]	Around 7 minutes, up to 10 on longer motorway trips [1]
Non-paying drivers with faster trips	Around 28% [1]	Around 33% [1]	Around 29%; around 14% slower because of diversion [1, 3]
AM public transport ridership	Around +3% [1]	Around +5% [1]	Around +6% [1]
Likely charge (Council wording)	"Lower likely charge" [1]	"Moderate likely charge" [1]	"Likely moderate charge to ensure affordability", with "the option of a higher charge on the motorways" [3]
Net revenue (Council wording)	"Limited net revenue" [4]	"Modest net revenue" [4]	"Significant net revenue" [4]

HOW THE NUMBERS WORK

What Council means by "congestion reduction"

The headline figure is the change in **kilometres driven in congested conditions**. On the isthmus and lower North Shore this falls by 28,100 km (4%) under Option A, 36,500 km (6%) under B and 180,700 km (28%) under C [4].

The modelling uses the Auckland Forecasting Centre's Macro Strategic Model, assumes City Rail Link (CRL) and associated bus routes are operating, and assumes charges in place in 2026. **Its morning peak runs 7am to 9am**, while the proposed charging window is 7am to 10am [4]. Vehicles paying in the AM peak: 20,500 (A), 32,500 (B), 49,500 (C) [4].

Exemptions, discounts and revenue

Council's FAQ states: "Current legislation limits mitigations to daily caps, exemptions for emergency services, and subsidised public transport" [1]. No resident discount, trades exemption or hospital arrangement is proposed in the engagement material. Rules for trucks, motorcycles and other vehicle types "will be determined by central government" [1].

Revenue "would first cover the cost of operating the scheme", and remaining revenue would be "prioritised for transport improvements" [1]. **Council has not published dollar estimates of gross or net revenue for any option** — only the qualitative descriptions in the table above [4].

Process and timeline

11 NOV – 11 DEC 2026

Engagement

Online, hard-copy forms, a webinar and drop-in events. Hearing-style event for regional organisations on 11 December [1].

MARCH 2027

Committee

Feedback goes to the Transport and Infrastructure Delivery Committee [1].

LATE 2027

Detailed proposals

Another opportunity to comment, then formal consultation by a scheme board [1].

MID-2028

Minister

Final proposal goes to the Minister of Transport [1].

2030 OR 2031

Charging starts

Earliest likely operation [1].

WATCH OUT

Council's own numbers don't always agree

- **Charge range:** the project page and form say modelling used $2 to $7 [1, 3]; the OurAuckland release says "example charges of $2–$5" [6].
- **Share not charged:** OurAuckland says "93–97 per cent of drivers would not be charged" [6], but Option C charges around 8.5% [1] and the deck shows 92% of trips uncharged under C [4].
- **Option C uncharged drivers:** the project page says around 29% get a faster trip [1]; OurAuckland says "one in three" [6].
- **Hours:** the modelled AM peak is 7am to 9am, but the proposed window is 7am to 10am [4].

THE LAW IN BRIEF

The Time of Use Charging Amendment Act 2025

The Act (2025 No 64) comes into force on 18 November 2026 [8]. Its purpose is "to improve traffic flow in order to improve network productivity" (s 65B) [8].

- **Initiation (s 65C):** local authorities may initiate a scheme. If none does within 3 years, the Minister may direct NZTA to [8].
- **Consultation (s 65E):** the scheme board must publicly consult. The current engagement opened before the Act commenced, so it is not this statutory consultation [8].
- **Exemptions (s 65Q):** only emergency vehicles and exempted large passenger service vehicles. No wider exemption power was found [8].
- **Revenue (s 65T):** first meets scheme costs, then must be invested in land transport in the region under an investment agreement (s 65ZB) [8].
- **Impact assessment (s 65ZD):** network, economic, social, cultural and environmental impacts, the views of Māori, privacy, and a monetised cost-benefit summary [8].
- **Privacy (s 65ZL):** personal information only for collecting charges or enforcement. No data retention period was found [8].

The Ministry of Transport consulted from April to 25 June 2026 on vehicle ratios and a proposed $70 infringement fee [10]. As reported on CBA's policy page, cars and light goods were set at 1.0, heavy buses 2.0 and medium and heavy goods vehicles 4.0 [13]. No final decision on the regulations was found as at 12 November 2026.

The Congestion Question (2020) found pricing could reduce Auckland congestion by around 8% to 12%, and that a larger scheme "could be phased in", starting in the city centre [11].

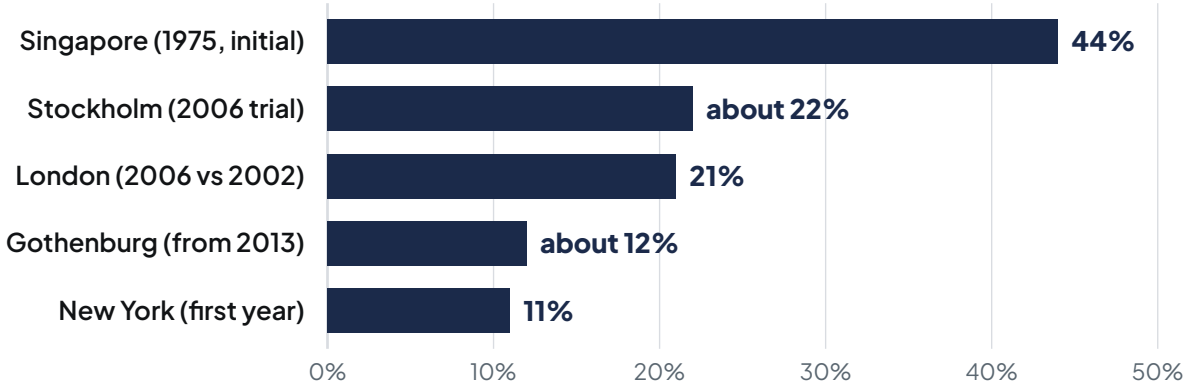
INTERNATIONAL EVIDENCE

02 What overseas cities have learned

Every comparable city that has run a scheme for a sustained period reports measurable falls in traffic and congestion. The harder lessons are about public trust, revenue use and keeping the gains.

Charging cuts traffic across the boundary by about a tenth to a fifth

Reported fall in traffic crossing the charged boundary



Sources: 19, 23, 24, 27, 31. Measures differ by city (entries to a zone, cordon crossings in charged hours). Read as orders of magnitude, not a league table.

Congestion falls by more than traffic does. London reported a 30% congestion reduction in its first year, Stockholm 30% to 50%, and Milan 28% [18, 23, 29]. Option C's modelled 28% sits in that range; Options A and B sit well below it [1].

Public opinion is usually hostile before a scheme starts and improves once people experience it. Gothenburg is the warning case: a majority voted against its charge in 2014 after the revenue became tied to a contested rail tunnel [24, 26].

> *"Motorway trips to places outside the city centre and fringe may not have effective public transport alternatives."*
>
> COUNCIL, TIME OF USE FEEDBACK FORM [3]

STOCKHOLM: SUPPORT BEFORE AND AFTER CHARGING [24]

2004
Over 45%
Said they would vote in favour.

JUST BEFORE CHARGING
Under 40%
Support fell as the start approached.

SEPT 2006 REFERENDUM
53%
Of valid votes in the City of Stockholm backed keeping the charges.

2013
Over 70%
Support after years of operation.

FROM FEBRUARY 2003

London

30%

Cut in congestion within the zone in year one [18]

- Traffic entering the zone was 21% lower in 2006 than in 2002 [19].
- By 2006 the benefit was masked by roadworks and road space reallocation [19].
- The Western Extension was removed at the end of 2010 after 62% of responses backed removal [21].

TRIAL 2006, PERMANENT 2007

Stockholm

30–50%

Fall in congestion during the trial [23]

- Public transport expanded from August 2005, before the trial [22].
- Studies "were not able to show any effects" on retail [23].
- Charges step in half-hour bands, SEK 11 to SEK 45 [25].

FROM JANUARY 2013

Gothenburg

57% / 55%

Voted against in the 2014 referendum (figures differ between papers) [24, 26]

- Primary goal was funding a package including the West Link rail tunnel [26].
- First-year gross revenue was €72 million against a €93 million forecast [26].
- The city council kept the charges [26].

FROM 1975

Singapore

45–65 km/h

Target expressway speed band that sets the price [28]

- Charges fall when speeds exceed the band and rise when they drop below it [28].
- Payment records were erased, typically within 24 hours [27].
- Demand is also managed by a vehicle ownership quota Auckland does not have [27].

FROM JANUARY 2012

Milan Area C

24%

Fewer road casualties, 2011 to 2012, against 11% city-wide [29]

- A June 2011 referendum backed traffic limits with a 79% majority [29].
- A €5 daily ticket covers all entries that day [29].
- 57% of Milan trips were already by public transport [29].

FROM 5 JANUARY 2025

New York

$562m

Net revenue in 2025, against a $500m target [32]

- 27 million fewer vehicles entered the zone in year one, an 11% reduction [31].
- Low-income drivers get 50% off the peak toll after 10 trips a month [33].
- A federal judge ruled the US Government's attempt to end the scheme unlawful on 3 March 2026 [36].

Cross-cutting lessons for Auckland

Theme	What the evidence shows	Auckland relevance
Public transport	Stockholm +4% to 5%; London bus travel +33% [18, 23]	Council models +3% to +6% AM ridership [1]
Revenue and cost	Operating costs ranged from 76% of revenue (London year one) to 17% (Gothenburg) [24, 26]	No dollar figures; Option A described as "limited net revenue" [4]
Equity	No regressive effects found in Stockholm; New York uses a targeted discount [23, 33]	NZ law limits mitigations to caps, emergency exemptions and public transport subsidies [1, 8]
Business	No significant overall retail or economic harm in London or Stockholm [19, 23]	No centre-level Auckland retail modelling has been published
Opinion	Low before, higher after; declined where revenue use was contested [24, 34]	No trial or referendum mechanism in the Act [8]
Durability	London's benefit eroded as road space was reallocated and roadworks increased [19]	Monitoring must separate charging effects from other network changes

OUR EARLIER WORK

03 How this fits CBA's record

This paper builds on positions CBA has already published: city centre first, alternatives before charges, and revenue rules with teeth.

CBA's policy page argues that the city-centre trip has a rail alternative since CRL opened, while "no rapid transit replaces a Harbour Bridge to Point Chevalier or Mt Wellington through-trip" [13]. Its proposed fit: "City-centre cordon. Peak only. Daily cap at two crossings. Feeder buses to CRL stations named in the investment agreement before the first charge. Parking zones on Newton, Eden Terrace and Grafton before the cameras. A two-year review under section 65U. Motorways only by a later variation, and only with a named alternative." [13]

> *"City centre first. Motorway later, if at all."*
>
> CBA POLICY PAGE, TIME OF USE CHARGING IN AUCKLAND: THE RECORD [13]

CBA's August 2026 dispatch argued that "pricing the scarce capacity is, in principle, the correct economic response", called for binding sequencing ("No charge starts until defined capacity is operational"), and described a charge on core motorways as "the strongest of the three shortlisted options" [16].

The official figures show both sides of that choice. Option C delivers about seven times the congestion reduction of Option A (28% against 4%) and the highest benefit-cost ratio ($4.10 against $3.40) [1], but Council concedes motorway trips may lack effective public transport alternatives [3]. **CBA's position is therefore staged:** city centre first, with motorway charging only later, and only once funded alternatives are running.

EXPLAINER

Peak spreading, in brief

CBA's peak-spreading proposal [14] is a voluntary, monitored programme for employers in major job centres to stagger start times: an 18–month pilot in two precincts, with rates remissions or grants for verified shifts, enhanced AT Fareshare and SCATS-based measurement.

- Time of use charging is the price signal; peak spreading gives employers and staff a practical way to respond [2, 14].
- Flat three-hour blocks (7am to 10am, 3pm to 6pm) [1] could create new shoulder peaks. Stockholm's graduated half-hour bands [25] point to the remedy.
- Many trades, freight and shift workers cannot easily move their hours [14].

> *"'Every dollar stays in our streets' is false unless the agreement says so."*
>
> CBA POLICY PAGE [13]

ASSESSMENT

04 Strengths and risks for Auckland

The case for charging is strong on evidence. The risks sit in scale, diversion, fairness tools and trust.

Strengths

- **Evidence base:** every comparable city running a scheme for a sustained period reports measurable reductions in traffic and congestion [18, 23, 24, 27, 29, 31].
- **A rail alternative into the city centre:** CRL is operating and assumed in Council's modelling [4].
- **Wide benefit for non-payers:** 28% to 33% of uncharged drivers are modelled to get faster trips [1].
- **Economic return:** Council estimates $3.40 to $4.10 of benefit per dollar invested [1].
- **Legal guard rails:** an impact assessment covering communities, Māori views and privacy; revenue ring-fenced to land transport in the region; annual monitoring [8].
- **No new road building required:** Council states it is "unrealistic to try to build our way out of it" [2].

Risks

- **Scale versus effect:** Option A is small (4% congestion reduction) and Council expects "limited net revenue", which may be largely absorbed by operating costs [1, 4]. London's first-year operating cost was 76% of revenue [24].
- **Diversion:** Option C leaves around 14% of uncharged drivers worse off and slows Khyber Pass Road, Great South Road and parts of the Western Ring Route [3, 4].
- **Weak alternatives for motorway trips** [3].
- **Limited mitigation tools:** no general exemption power beyond emergency vehicles and public transport or school buses [8].
- **Freight double charging:** draft regulations proposed a 4.0 ratio for medium and heavy goods vehicles, and port trucks already pay a peak access fee [13].
- **Trust and timing:** no trial or referendum mechanism [8]; charging is not expected before 2030 or 2031 [1]; inconsistent Council figures risk undermining trust.

RECOMMENDATIONS

05 Our position in full

CBA supports time of use charging in principle as a demand management tool, on conditions. The asks below map onto Council's feedback form [3] and the regional organisation event [1].

Position on the options (question 11)

CBA asks Council to adopt a staged approach: begin with a city centre cordon (Option A, or Option B if the hospital access, Gillies Avenue and SH16 diversion issues can be resolved), and set out now, as a separate future variation with its own consultation, the conditions under which core motorway charging (Option C) would follow. Those conditions should include named, funded and operating rapid transit alternatives for the affected motorway corridors [11, 13, 16].

Design (questions 6, 8, 10 and 15)

1. A daily cap, for example two charged crossings a day, written into the scheme proposal, so trades, couriers and carers making several trips are not charged repeatedly [13, 12].
2. Graduated shoulder pricing rather than flat three-hour blocks, as in Stockholm, to avoid new shoulder peaks [25, 14].
3. A transparent price-setting rule tied to measured speeds or reliability, similar to Singapore's speed bands, with any increase made only by formal variation [28, 8].
4. Set the charge at the minimum needed, as Council's own background document states [2].
5. A fixed boundary in the Order, with any extension treated as a variation requiring fresh consultation [13, 8].

Alternatives first (questions 4 and 14)

6. Name in the investment agreement, before charging starts, the bus, rail and ferry services that will be added, with start dates [8, 16]. Stockholm expanded public transport ahead of its trial [22]; London's bus travel rose 33% in the first year [18].
7. Fund capacity on routes Council expects to become crowded, as the supplementary deck acknowledges [4].

Fairness and mitigation (questions 13 and 14)

8. Ask the Government to widen the mitigation tools available, for example a targeted low-income discount similar to New York's [33], since current law limits options [1, 8].
9. Require the impact assessment to report effects by income, area, occupation (trades, freight, shift workers) and caring responsibilities, as required in substance by s 65ZD [8, 16].
10. Address Auckland Hospital access under any option that includes it (staff, patients and visitors), since emergency vehicles are the only health-related exemption in the Act [8, 13].

Local streets, parking and business

11. Require diversion modelling and before-and-after monitoring on Dominion Road, Mt Eden Road, Manukau Road, Gillies Avenue, Khyber Pass Road and Great South Road [4, 13].

12. Put residential parking zones in place on boundary streets before cameras go live, using the Vehicle Use and Parking Bylaw 2025 [13].
13. Publish centre-level retail and turnover analysis for town centres near each boundary. None has been published [13].
14. Avoid double charging of port freight; ask Council and NZTA to coordinate with Ports of Auckland's existing peak access fee [13].

Peak spreading (question 15)

15. Pair time of use charging with CBA's proposed 18–month employer peak-spreading pilot in the city centre and one industrial precinct, using public sector anchor employers, enhanced Fareshare and SCATS monitoring [14].
16. Monitor the shoulder periods either side of the charging windows, and adjust prices if new peaks form [14, 25].

Revenue, transparency and review

17. Publish gross and net revenue estimates and operating cost estimates for each option now. Council has published only qualitative descriptions [4].
18. Publish the modelling reports, including the conversion from the 7am to 9am model peak to the proposed 7am to 10am window [4].
19. Correct the inconsistencies across Council publications [1, 3, 4, 6].
20. Report revenue use annually, line by line, against the investment agreement [8, 16].
21. Commit to a published two-year review with clear tests (peak speeds, diversion on boundary streets, net revenue, bus punctuality), alongside the Secretary's annual monitoring under s 65U [8, 13].
22. Write a data retention limit into the scheme proposal, building on s 65ZL and on Singapore's practice of erasing payment records within 24 hours [8, 27].

Process

23. Ask for a "no charge" or "none of these" choice to be recorded and reported separately in the engagement analysis [3, 13].

§

EVIDENCE

Sources and data notes

DATA NOTES

How the figures were checked

Every figure in this edition comes from the sources below and appeared in CBA's original paper of 12 November 2026; none has been added. Most figures are Council modelling or overseas evaluations, which Stats NZ does not publish. Stats NZ cross-checks apply to the Auckland context figures: commuter numbers and travel-to-work modes (2023 Census, Aotearoa Data Explorer) against Council's 66 hours and 29 million hours, and Auckland regional GDP (Stats NZ regional gross domestic product) for scale against the $2.6 billion congestion cost.

Not found or not verified: Council has not published dollar estimates of revenue, operating cost or capital cost for any option. No legal boundary maps were found beyond the supplementary maps. No Auckland retail, parking spillover or property analysis was found. No final decision on the regulations was found; vehicle ratios are taken from CBA's policy page. The Congestion Question main findings report could not be opened directly. The Gothenburg referendum result is reported as 57% or 55% against by the same research group in different papers.

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