CITY BUILDERS ASSOCIATION LIMITED

Rōpū Hanganga Tāone · Auckland civic think tank

POLICY PAPER

Time of Use Charging in Auckland

What overseas experience tells us, and what CBA believes

Options A, B and C · overseas evidence · city centre first · design and mitigation

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TO	Auckland Council and Auckland Transport, Time of Use Charging engagement (closes 11 December 2026)
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Time of Use Charging in Auckland: What Overseas Experience Tells Us, and What CBA Believes

City Builders Association (CBA), Rōpū Hanganga Tāone. Auckland civic think tank.

Policy paper dated 12 November 2026. Submission to the Auckland Council and Auckland Transport engagement "Time of Use Charging in Auckland", open 11 November to 11 December 2026 [1].

Figures are cited by number to the sources in section 7. Where something could not be found or verified, the paper says so.

1. Summary

Auckland Council and Auckland Transport (AT) are asking for feedback on three time of use charging options: 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]. 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, with the options assuming a maximum charge around the middle of that range [1]. Feedback goes to the Transport and Infrastructure Delivery Committee in March 2027, a final proposal would go to the Minister of Transport in mid-2028, and charging could start in 2030 or 2031 [1].

Council's own modelling shows a large gap between the options. Option A charges about 3.5% of morning peak trips and reduces congested driving across the isthmus and lower North Shore by about 4%. Option C charges about 8.5% of trips and reduces it by about 28%, but around 14% of uncharged drivers would get a slower trip because of diversion [1][3][4]. Council describes Option A as producing "limited net revenue" and Option C as producing "significant net revenue" [4].

Overseas experience is consistent on several points:

- Established schemes in Europe and New York cut traffic across the charged boundary by roughly 11% to 22% (Singapore's original 1975 scheme cut it by 44%) and cut congestion by more than that. London reported a 30% congestion reduction in year one, Stockholm 30% to 50%, and New York 11% fewer vehicle entries in its first year [18][22][30][31].
- Public opinion is usually hostile before a scheme starts and improves once people experience it. Stockholm support rose from under 40% before the 2006 trial to 53% at the referendum and over 70% by 2013 [24]. 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].
- Studies in Stockholm and London found no significant overall harm to retail or the central economy, although effects on individual businesses near a boundary are possible [19][23].
- Gains erode if freed road space is reallocated or dug up. By 2006, London's congestion benefit was masked by roadworks and street changes [19].
- Credibility depends on the package: public transport capacity in place at launch, transparent revenue use, simple rules and a defined review.

CBA supports charging in principle, on conditions: alternatives first, ring-fenced revenue, a daily cap, parking controls at the boundary, an impact assessment that covers local streets, retail, freight and the hospital, and a review gate [13][14][16]. CBA's position on the options, set out in section 6.1, is city centre first: begin with a city centre cordon, and treat motorway charging as a later, separately consulted change only once named rapid transit alternatives are funded and running.

2. What Council proposes

2.1 Purpose and rationale as published

Council describes time of use charging 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]. It states that regular commuters lose an average of 66 hours a year in traffic, Aucklanders collectively lose around 29 million hours a year, and congestion costs the economy an estimated $2.6 billion [1]. The underlying January 2025 white paper puts the $2.6 billion as $1.9 billion in time delays plus more than $700 million in macro-economic costs, by 2026 [5]. Council's FAQ states that the primary purpose "is to reduce congestion, not raise revenue" [1].

In 2023 the Transport, Resilience and Infrastructure Committee agreed to set up a team to progress time of use charging [1]. The options were narrowed from 13 to three [2].

2.2 The three options, exactly as published

Charging hours for all options: "drivers would generally be charged on weekdays when crossing into the charged area during the morning rush (7am - 10am) or when leaving during the afternoon rush (3pm - 6pm)." Charge: "Modelled charge ranges from $2 (low) and $7 (high). Options currently being considered assume a maximum charge around the middle of that range." [1]

	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, with the area expanded to include commercial areas and some neighbourhoods adjacent to the city centre. Parnell and Ponsonby to be investigated in the next phase [1] [3]	Crossing into the city centre or travelling on congested core motorway sections (between the Harbour Bridge, Point Chevalier or Mount Wellington). Only one charge from motorway into city centre. Some motorway sections may also need charging between peaks [1][3]
Share of AM peak trips charged	Around 3.5% [1]	Around 5.5% [1]	Around 8.5% [1]
Reduction in congestion, isthmus and lower North Shore	4% [1]	6% [1]	28% [1]
Average time saved by paying drivers	Around 2.5 minutes [1]	Around 4 minutes [1]	Around 7 minutes, up to 10 minutes on longer motorway trips [1]
Non-paying drivers with faster trips	Around 28% [1]	Around 33% [1]	Around 29% [1]; around 14% slower because of diversion [3]
Economic benefit per dollar invested	$3.40 [1]	$3.70 [1]	$4.10 [1]
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]

The supplementary deck adds detail [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.
- The headline "congestion reduction" 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.
- Vehicles paying in the AM peak: 20,500 (A), 32,500 (B), 49,500 (C). Regional vehicle trips fall by 0.6%, 1.3% and 1.6%. Public transport passengers rise by 2,600, 4,500 and 5,200.
- Diversion: SH16 from Tamaki Drive to the Central Motorway Junction is expected to be 5% to 10% slower under Option A. Option B slows SH16 and Gillies Avenue. Option C slows Khyber Pass Road, Great South Road and some sections of the Western Ring Route.
- Example route: the Southern Motorway from the South Eastern Highway to the Central Motorway Junction takes 23 minutes without a charge, 2 minutes less under A, 4 minutes less under B and 10 minutes less under C. Dominion Road (SH20 to CMJ, 16 minutes) improves by 1, 2 and 1 minutes respectively.

2.3 Exemptions, discounts and mitigation

Council's FAQ states: "Current legislation limits mitigations to daily caps, exemptions for emergency services, and subsidised public transport." Council "will work with central government through the next phase to explore possible solutions" for those most affected [1]. The background document mentions possible "reimbursements via existing allowances, credits, or price caps" [2]. Rules for trucks, motorcycles and other vehicle types "will be determined by central government" [1]. No resident discount, trades exemption or hospital arrangement is proposed in the engagement material.

2.4 Use of revenue

Council states that revenue "would first cover the cost of operating the scheme" and that "the law requires that any remaining revenue would be prioritised for transport improvements, including better public transport services and travel choices in and around the charge area" [1]. The feedback form says surplus money "will be prioritised for improving public transport services and infrastructure around the charging area" [3]. Council has not published dollar estimates of gross or net revenue for each option. Only the qualitative descriptions in the table above were found.

2.5 Process, timeline and the questions asked

- Engagement: Wednesday 11 November to Friday 11 December 2026, online, by hard-copy form (email timeofusecharging@aucklandcouncil.govt.nz, library or Freepost 190198), webinar on 19 November at 7pm, and drop-in events [1].
- Regional organisations and interest groups: a "hearing-style" event on Friday 11 December 2026, 10am to 1pm, at Auckland Town Hall or on Microsoft Teams. Registrations close Friday 4 December 2026 [1].
- Next steps: feedback to the Transport and Infrastructure Delivery Committee in March 2027, which will consider a scheme initiation partnership with NZ Transport Agency (NZTA) and a preferred location. A scheme board (Auckland Council, NZTA and an independent chair) would develop detailed plans and formally consult. A final proposal would go to the Minister of Transport in mid-2028, with operation in 2030 or 2031 [1]. Council says there will be another opportunity to comment on detailed proposals in late 2027 [1].

The feedback form [3] asks 15 optional questions:

1. How much of an issue is traffic congestion (not an issue to major issue).

2. How often you travel in peak hours.
3. How you usually travel in peak hours.
4. Which factors are most important (up to three): travel times, reliability, keeping charges low, minimising impacts on people with limited alternatives, improving public transport, investing in future infrastructure, simplicity, environmental benefits.

5, 7 and 9. How each option would affect your usual peak travel.

6, 8 and 10. Whether the expected improvements for each option would be worthwhile, with reasons and what would make it work better.

11. Which option Council should recommend as its preferred approach (A, B, C, "I don't know" or "Other").
12. What you would most likely do if charged (up to three).
13. What would make it difficult to change when or how you travel.
14. Anything else about how charging would affect you or others.
15. Anything else about time of use charging.

There is no explicit "no charge" option in question 11, although "Other" is available [3]. CBA's policy page records Councillor John Watson criticising the absence of a "no charge" option [13].

2.6 Inconsistencies in the published material

The engagement material is not fully consistent, and CBA may wish to ask Council to correct it:

- Charge range: the project page and form say modelling used $2 to $7 [1][3]. The OurAuckland release says modelling used "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 geography: OurAuckland says 28% "across the lower north shore" [6]; the project page and deck say "across the isthmus and lower North Shore" [1][4].
- Option C uncharged drivers: the project page says around 29% get a faster trip [1]; OurAuckland says "one in three" [6].
- Hours: the modelling AM peak is 7am to 9am, but the proposed charging window is 7am to 10am [4].

2.7 The legal framework

The Land Transport Management (Time of Use Charging) Amendment Act 2025 (2025 No 64) has a date of assent of 18 November 2025 and comes into force on 18 November 2026 [8]. (Parliament's bill page records Royal Assent on 17 November 2025 [9]. The legislation website date is used here.) The Act inserts a new subpart into the Land Transport Management Act 2003. Key provisions:

- Purpose (s 65B): "to improve traffic flow in order to improve network productivity" [8].
- Initiation (s 65C): one or more local authorities may initiate a scheme. If none does so within 3 years of commencement, the Minister may direct NZTA to initiate one [8].
- Proposal (s 65D): must set out the scheme area, charging areas, maximum charges by vehicle class, a schedule of times and charges, a methodology for increasing maximum charges, collection methods, the approach to exempting public transport and school buses, and an investment approach [8].
- Consultation (s 65E): the scheme board must publicly consult and must make the impact assessment available [8]. The current engagement opened before the Act commenced, so it is not this statutory consultation.
- Decision (s 65G): the Minister may recommend an Order in Council only if satisfied, in consultation with the Minister of Finance, that the scheme is consistent with the Act's purposes [8].

- Exemptions (s 65Q): a charge is not payable for emergency vehicles, or for large passenger service vehicles exempted by Order in Council [8]. No wider power to exempt other vehicle classes was found in the Act.
- Revenue (s 65T): revenue first meets establishment, operating, billing, monitoring and related costs, then must be invested in land transport activities (State highways, local roads, public transport, active transport) in the scheme region, in line with an investment agreement [8].
- Investment agreement (s 65ZB): must be reached before the scheme operates and at least every 5 financial years, must list the activities to be funded, and must "prioritise land transport activities that improve the ability of people to move into, out of, within, and around the scheme area" [8].
- Impact assessment (s 65ZD): must cover effects on the State highway, local road and public transport networks; economic, social, cultural and environmental impacts on key communities of interest; mitigation of network and distributional impacts; the views of Māori in the region; privacy impacts; and a monetised summary of costs and benefits [8].
- Monitoring (s 65U): the Secretary for Transport must monitor and report annually on each scheme [8].
- Privacy (s 65ZL): personal information may be used only for collecting charges or enforcement, although disclosures permitted under information privacy principle 11 of the Privacy Act 2020 are not prohibited. NZTA and the enforcement authority must publish privacy policies after consulting the Privacy Commissioner [8]. No data retention period was found in the Act.

Regulations are needed before any scheme can be established. The Ministry of Transport consulted from April to 25 June 2026 on vehicle charging ratios and a proposed fixed $70 infringement fee for each unpaid charge [10]. As reported on CBA's policy page, the proposal set passenger cars and light goods vehicles at a ratio of 1.0, heavy buses at 2.0 and medium and heavy goods vehicles at 4.0 [13]. No final decision on the regulations was found as at 12 November 2026.

2.8 Earlier Auckland work

The Congestion Question, a joint central and local government project whose report was released in 2020 [11][12], found that congestion pricing could reduce congestion in Auckland by around 8% to 12% when fully implemented, similar to school holiday conditions. Officials found a larger strategic corridors scheme would be the most beneficial option and that it "could be phased in", initially starting in the city centre and expanding in line with planned public transport improvements [11]. As summarised by Greater Auckland, the report proposed peak charges of up to $3.50 with a $7 daily cap, and sought to avoid broad vehicle exemptions [12]. The Congestion Question main findings report could not be opened directly during this research, so its detailed figures have not been verified against the original. The Ministry of Transport's regulations consultation states that the enabling approach reflects a recommendation of the select committee inquiry into congestion in Auckland [10].

3. What overseas cities have learned

3.1 London (from February 2003)

- Design today: £18 a day if paid on the day or in advance, £21 if paid within three days, applying 7am to 6pm Monday to Friday and noon to 6pm on weekends and bank holidays. Residents in the zone receive a 90% discount. The charge rose from £15 on 2 January 2026, the first rise since 2020 [20].
- Traffic and congestion: TfL reports a 30% reduction in congestion within the zone and a 15% reduction in circulating traffic in the first year, and a 33% boost in bus travel [18]. In 2006, traffic entering the zone was 21% lower than in 2002 [19].
- Erosion of benefits: by 2006 TfL observed "a sharp increase in congestion" despite stable traffic, driven by roadworks (notably by utilities) and road space reallocated to buses, pedestrians and safety schemes. Compared with the pre-charging baseline, congestion was only 8% lower in 2006, although TfL estimated the scheme was still delivering relief "broadly in line with the 30 percent reduction" relative to no scheme [19].
- Revenue and cost: net revenues were £123 million in 2006/07, spent mainly on buses [19]. In the first year, operating cost was £141.4 million against revenue of £186.7 million (76%); by 2015/16 it was £90.1 million against £258.4 million (35%), as reported by Swedish researchers using TfL figures [24].
- Business: TfL found "no significant overall impacts from the original scheme on the central London economy", with central London retail sales growth roughly twice the national rate [19].
- Western Extension: introduced in 2007 [19] and removed at the end of 2010 after 62% of consultation responses backed removal [21]. Boundary extensions can be reversed if they lack public support.

3.2 Stockholm (trial 2006, permanent from 2007)

- Trial: 3 January to 31 July 2006, combined with expanded public transport from August 2005 [22].
- Traffic across the cordon fell by about 22%, against a target of 10% to 15%, and congestion fell by around 30% to 50% [23]. On arterials, delay fell by one third in the morning peak and by half in the afternoon peak [23]. Improvements extended far from the cordon because spillback queues shrank [23].
- Public transport use rose by around 4% to 5% [23].
- Opinion: over 45% said they would vote in favour in 2004, support fell below 40% just before charging began, then 53% of valid votes in the City of Stockholm supported keeping the charges in the September 2006 referendum. Support exceeded 70% by 2013 [24]. The share of positive newspaper articles rose from 3% to 42% during the trial [23].
- Retail: studies "were not able to show any effects of the congestion charges" on retail [23].
- Equity: Stockholm studies found no regressive effects; some found progressive effects, others neutral [23].
- Design: charges now step up and down in half-hour bands, from SEK 11 midday to SEK 45 at the peak, with a daily maximum of SEK 135 in peak season [25]. Graduated pricing reduces the incentive to bunch just outside a charging window.
- Company cars made up 37% of passenger cars crossing the Stockholm cordon, and their number increased when charges rose, because the employer pays [24]. Who actually pays matters to how well the price works.

3.3 Gothenburg (from January 2013)

- Traffic across the cordon in charged hours fell by about 12% [24].

- The scheme's primary goal was funding the West Swedish Agreement, including the West Link rail tunnel. First-year gross revenue was €72 million, below a forecast of €93 million; operating cost was about €12 million, or 17% of revenue [26].
- Opinion: support was just over 30% in 2011 and 27% just before launch [24]. In a consultative referendum in September 2014, a majority voted against the charges (57% according to Börjesson and Kristoffersson 2015 [26]; 55% according to the same research group's 2017 paper [24]). The city council kept the charges [26]. Support declined further as the West Link's benefits and costs were questioned [24].
- Lesson: tying the charge to revenue for one contested project, rather than to visible congestion relief, undermined public support [24][26].

3.4 Singapore (from 1975)

- The Area Licensing Scheme (1975) cut traffic entering the restricted zone by 44% initially. The reduction was 31% by 1988, even though city employment grew by a third and vehicle numbers by 77% over that period [27].
- Electronic Road Pricing (1998) charged per passage rather than per day, and traffic into the CBD fell by a further 10% to 15% during operating hours. Revenue under ERP was only about 60% of the old scheme's [27].
- Rates are set to keep speeds within 45 to 65 km/h on expressways and 20 to 30 km/h on arterial roads. Charges are lowered when speeds exceed the band and raised when they fall below it [28].
- Privacy design: transaction records needed for bank payment were erased from the central system, typically within 24 hours [27].
- Context: Singapore manages demand alongside a Vehicle Quota Scheme on car ownership, parking policy and land use [27]. Auckland has no equivalent ownership quota.

3.5 Milan Area C (from January 2012)

- An 8.2 km² zone, 4.5% of the municipality. A June 2011 referendum backed traffic limits with a 79% majority [29].
- €5 daily ticket covering all entries by the same vehicle that day [29].
- Results reported by the City of Milan via C40: 28% decrease in road congestion, 24% fewer road casualties between 2011 and 2012 (compared with 11% city-wide), and a 10% productivity gain in city-centre freight deliveries according to a courier association [29].
- Context: 57% of trips in Milan were by public transport [29]. Milan charged a dense core that already had a metro.

3.6 New York (from 5 January 2025)

- In the first year, 27 million fewer vehicles entered the Congestion Relief Zone, an 11% reduction; vehicle miles travelled in the zone fell by 7.1% [31]. The MTA's first evaluation report shows 11% fewer entries from January to October 2025 [30].
- Revenue: $701.2 million gross, $139.2 million in programme expenses and $562 million net in 2025, against a $500 million target [32].
- Equity: a Low-Income Discount Plan gives a 50% discount on the peak toll after the first 10 trips in a calendar month, for owners with income of $50,000 or less or enrolled in specified assistance programmes [33].
- Opinion: in December 2024, New York State voters opposed reimposing the tolls 51% to 29%. By March 2025, New York City voters wanted the tolls kept 42% to 35%, while statewide voters wanted them eliminated 40% to 33% [34].

- Business: the Partnership for New York City, a business organisation, reported pedestrian numbers in the zone up 8.4% and retail sales in the zone on track to be $900 million higher in 2025 than 2024 [35]. This is a business group's report, not an independent evaluation.
- Legal risk: on 3 March 2026 a federal judge ruled the US Government's attempt to end the programme unlawful [36]. Even an operating scheme can face prolonged challenge from a higher level of government.

3.7 Cross-cutting lessons

Theme	What the evidence shows	Auckland relevance
Traffic	Boundary traffic fell about 11% to 22% in London, Stockholm, Gothenburg and New York, and 44% initially in Singapore [19][23][24][27][31]	Council's options remove 0.6% to 1.6% of regional trips but target the worst bottlenecks [4]
Congestion	Congestion falls more than traffic: London 30%, Stockholm 30% to 50%, Milan 28% [18][23][29]	Option C's 28% is in this range; Options A and B are well below it [1]
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]	Council gives 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 (Stockholm, New York); declined where revenue use was contested (Gothenburg) [24][34]	Auckland has 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

4. How this fits CBA's congestion page and peak-spreading work

4.1 CBA's congestion charging page

CBA's page "Time of use charging in Auckland: the record" (thecitybuilder.com/policy/congestion-charging, checked 8 October 2026) [13] sets out positions this paper builds on:

- "City centre first. Motorway later, if at all." The 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].
- Engagement versus law: "That engagement has no statutory weight. The legal consultation is section 65E" [13].
- 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]
- Parking spillover: residential parking zones are available under the Vehicle Use and Parking Bylaw 2025, clauses 17 and 18 [13].
- Freight: CBA notes Ports of Auckland already runs a peak access fee, so a motorway charge could be a second charge on the same truck trip [13].
- Revenue: "'Every dollar stays in our streets' is false unless the agreement says so." [13]
- Submission asks: split the options, fix the boundary in the Order, require the impact assessment to cover Dominion Road, Mt Eden Road, Manukau Road, centre retail, hospital access and residents, require a privacy retention limit, and avoid promising a public vote the Act does not provide [13].

CBA's "Rethinking the Connected City" article makes the wider case: London's approach "works better than pure ownership bans because it preserves access while pricing scarcity", and successful places "price its use where space is scarce, invest heavily in alternatives that actually compete on time and convenience" [17].

CBA's answer page "Is Auckland introducing congestion charging?" [15] gives a plain-language summary and links to the policy page and the peak-spreading proposal.

4.2 CBA's August 2026 dispatch

"If You're Hell Bent on Charging Us, Make Sure You Provide Better Alternatives" [16] states that "pricing the scarce capacity is, in principle, the correct economic response", and calls for binding sequencing ("No charge starts until defined capacity is operational"), full equity and diversion analysis, "revenue transparency and hypothecation with teeth" and "a trial or staged introduction with clear evaluation gates". It argues that a charge on the Harbour Bridge approaches or core motorways is "the strongest of the three shortlisted options" and that a city-centre-only charge would be tokenism [16].

The official figures now published 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]. Council also concedes that "Motorway trips to places outside the city centre and fringe may not have effective public transport alternatives" under Option C [3]. CBA's position is therefore staged: city centre first, with motorway charging only later, and only once funded alternatives are running, rather than selecting Option C at the outset.

4.3 CBA's peak-spreading proposal

CBA's peak-spreading page [14] proposes a voluntary, monitored incentive programme for employers in major job centres to stagger start times. It draws on Vickrey's bottleneck model, which showed that spreading departures can in principle remove queueing while the same number of people pass through, and that Vickrey "argued for a time-varying toll to achieve this" [14]. It cites a US Transportation Research Board synthesis finding peak-hour car traffic on approaches to work centres fell by 5% to 10% under large variable work-hours programmes, and warns that one simulation found shifting 20% of peak demand made delay worse by overloading intersections outside the old peak [14]. The page proposes an 18-month pilot in two precincts, rates remissions or grants for verified shifts, enhanced AT Fareshare and SCATS-based measurement [14].

The two instruments fit together:

- Time of use charging is the price signal; peak spreading gives employers and staff a practical way to respond to it. Council's background document itself gives "start work slightly earlier one day" as an expected response [2].
- Council's proposed flat three-hour charging blocks (7am to 10am, 3pm to 6pm) [1] could create new shoulder peaks just before 7am and after 10am. Stockholm's graduated half-hour bands [25] and CBA's caution about over-shifting [14] point to the same remedy: graduated or shoulder pricing, and monitoring of shoulder periods.
- Many trades, freight and shift workers cannot easily move their hours [14]. Council's form already asks whether fixed work hours or a work vehicle make change difficult (question 13) [3].

5. Strengths and risks for Auckland

5.1 Strengths

- Evidence base: every comparable city that has run a scheme for a sustained period reports measurable reductions in traffic and congestion [18][23][24][27][29][31].
- Rail alternative into the city centre: CRL is operating and is 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: the Act requires an impact assessment covering communities, Māori views, privacy and a monetised cost-benefit summary; ring-fences revenue to land transport in the region; and requires annual monitoring [8].
- No new road building required: Council states it is "unrealistic to try to build our way out of it" given space and land costs [2].

5.2 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: every option slows some roads. 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: Council concedes motorway trips to places outside the centre and fringe may lack effective public transport alternatives [3].
- Limited mitigation tools: the Act provides no general exemption power beyond emergency vehicles and public transport or school buses [8]. Trades, carers, shift workers and lower-income drivers rely on caps and public transport improvements [1].
- Freight double charging: draft regulations proposed a 4.0 ratio for medium and heavy goods vehicles [13], and port trucks already pay a peak access fee at Ports of Auckland [13].
- Boundary effects: parking spillover and retail effects near the cordon edge have not been modelled for Auckland. Overseas, individual stores near a cordon can be affected even where the average effect is small [23].
- Public acceptance: there is no trial or referendum mechanism in the Act [8]. Gothenburg shows support can fall when revenue use is contested [24].
- Erosion over time: by 2006, London's benefit was masked by roadworks and road space reallocation [19].
- Privacy: number plate recognition will be used [1]. No retention limit was found in the Act [8].
- Timing: charging is not expected before 2030 or 2031 [1], so the public transport improvements Council relies on will need to be funded and scheduled well before revenue arrives.
- Communication: inconsistent figures across Council publications (section 2.6) risk undermining trust.

6. CBA's position

The asks below map onto the feedback form [3] and the regional organisation event [1]. They are CBA's position.

6.1 Position on the options (question 11)

CBA supports time of use charging in principle as a demand management tool, on conditions. 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. This reflects The Congestion Question's phased approach [11], CBA's "city centre first" record [13] and the evidence that larger schemes deliver much larger benefits [1][16].

6.2 Design (questions 6, 8, 10 and 15)

1. A daily cap, for example two charged crossings a day, written into the scheme proposal, so that 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].

6.3 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 from August 2005, ahead of its January 2006 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].

6.4 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].

6.5 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].

6.6 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].

6.7 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 listed in section 2.6 [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].

6.8 Process

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

7. Sources

All web sources accessed on 12 November 2026 unless stated.

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Information that could not be found or verified

- Council has not published dollar estimates of revenue, operating cost or capital cost for any of the three options.
- No legal boundary maps or street-level cordon lines were found beyond the supplementary maps.
- No Auckland retail, turnover, parking spillover or property analysis for the options was found.
- No final decision on the time of use charging regulations was found. The vehicle ratios are taken from CBA's policy page because the Ministry's consultation document could not be opened directly.
- The Congestion Question main findings report could not be opened directly; its figures are taken from the Ministry's web page and the Greater Auckland summary.
- The Gothenburg referendum result is reported as 57% or 55% against by the same research group in different papers.