Submission on *Keeping cash local - public consultation paper*

Access to cash consultation - Questions 10 and 11

Submitted by: King Yew Choo

Capacity: Personal capacity

Location: London, United Kingdom

Prepared: 29 July 2026

Scope

I write from London in a personal capacity and confine my response to a measurement-design point. This response does not rely on, or claim, New Zealand cash-system operating experience or a community mandate. I do not offer a view about the needs of any named place or speak for any affected community or operator.

Question 10

Yes. The standard should permit a defined rural settlement, town or part of a city to receive a different service level where evidence assessed under published criteria shows that the usual rule would materially under-provide or over-provide.[1]

The process should be capable of producing an upward, downward or service-specific variation. Each candidate decision should identify the locality, show any effect on the applicable Territorial Authority-level result, address proportionate provision cost, give reasons and set a review date. Cross-boundary services should count only under rules that address genuine availability, capacity, responsibility and double counting. A lower or partial requirement should preserve the customer outcome that the eventual standard requires; it should not count a partial service as full-service access without an express equivalence rule. RBNZ already recognises that a common rule may under-provide or over-provide and identifies omitted places which it considers may warrant service.[3]

Question 11

I would select all seven substantive factors listed in Question 11: the number of people in the locality; the wider-area population; the number of businesses; distance to the next town with cash services; the importance of tourism; community characteristics; and provision cost. They need not receive equal weight in every case.

Under **Other**, I would add:

1. actual travel conditions and transport options, including severance, necessary scheduled links and mobility or accessibility barriers;
2. the completeness, customer eligibility and ordinary availability of existing services, considered separately for free withdrawal, deposit and cash-swap outcomes;

3. any material difference between the locality or population classified as covered using the straight-line convention in RBNZ's illustrative analysis and using an appropriate network route; and
4. location-based resilience flags, such as dependence on a single transport link or seasonal disruption. These should identify an issue for later reliability design, not turn route proximity into proof of resilience.

Community characteristics should be used as non-determinative risk indicators and distributional lenses, not as automatic proof for or against a different service level. RBNZ should combine baseline official data with proportionate local validation, including lived experience and input from affected communities and operators and, where relevant, mana whenua, whānau, hapū, iwi and marae. Low participation should not be treated as evidence that no need exists. I do not infer the position of any such group.

RBNZ's commissioned Litmus research records journey, transport, mobility and service-type issues among participants in ten rural towns.[5] Its survey used non-representative recruitment and is not representative of the broader rural population. I use it only to identify possible inquiry factors, not their prevalence or any community's position.

A targeted straight-line and route comparison

RBNZ deliberately uses straight-line distance in its illustrative analysis. It cites simplicity, independence from continuing third-party route data and a first-stage finding that road travel was unlikely to produce materially different results in site number or location.[2] The official materials cited here do not show whether locality or population-origin classifications differ. Before settling the exception method, RBNZ should therefore summarise the existing work: its unit, routing method and dated inputs; whether it compared sites only or also classifications; the scale and distribution of any changes; and the main limitations.

Network routing should be **targeted exception evidence**, not a second compliance metric. Use it only for a candidate exception or a clear geographic or travel-network risk, such as water, a necessary ferry, a disconnected route, a cross-boundary service or substantial route divergence. The eventual governance model should designate one common method and consult on mode and link assumptions, seasonal availability, accessibility, uncertainty and updates before results carry weight. Route distance does not prove walkability, transport availability, safety or resilience. The check would not alter the straight-line convention in RBNZ's illustrative analysis or create a second threshold; the eventual compliance definition remains for later detailed design.

Stats NZ provides a domestic precedent for documenting routing inputs through its drive-time Urban Accessibility method.[4] It is not a cash-access dataset, an exact person-count or kilometre-threshold method, or a pedestrian-access method.

A short exception decision record

For each candidate exception, one responsible entity under the eventual governance model should prepare a short common record:

1. **Unit and effect:** locality, Territorial Authority and effect on the Territorial Authority-level result.
2. **Service baseline:** customer eligibility and withdrawal, deposit and cash-swap outcomes separately, including fees, hours or reliability where they determine qualification.
3. **Factors and evidence:** official baseline data, locally grounded validation and material limitations; the burden should not fall solely on the community.
4. **Route sensitivity, if triggered:** classification difference, dated method, assumptions and uncertainty, including cross-boundary and scheduled links.
5. **Outcome and review:** upward, downward, relocation, service-specific, equivalent-arrangement or no adjustment; reasons, proportionate cost, owner, factual-correction route and review date. Deferral of a material access risk should be time-limited and include a proportionate interim response.

Any retailer or community-provider arrangement should be voluntary, compensated and operationally viable, not treated as cost-free capacity. Public reporting should use only aggregates that pass RBNZ's privacy and disclosure-control assessment.

The record would not dictate a site, create a 100% requirement or make a route difference decisive. It would make candidate decisions comparable.

Proportionality and the strongest objection

The strongest objection is that RBNZ has already tested road distance, route data add dependency and cost, and a record may add bureaucracy without changing a decision. The cited material does not establish material national misclassification or justify a universal route exercise. The proportionate sequence is to disclose the work already done, use risk-based checks, pilot the common method before any recurring duty and permit a reasoned no-adjustment outcome. Later implementation should identify coordination, data and assurance costs, correction and review rights, and operator impacts.

Limits of this submission

I take no position on whether the proposed 95%, 3 km, 15 km, 30 km or 2.5-sites-per-10,000 figures are correctly calibrated; whether any named place needs more or less service; whether a district or New Zealand as a whole would have adequate access; or whether implementation should be voluntary or statutory. I do not infer the position of Māori, disabled people, older people, rural communities, retailers, banks or cash-distribution operators.

References

[1] Reserve Bank of New Zealand, *Keeping cash local - public consultation paper* (25 February 2026), pp. 7-8 and 21-22 (proposed standard, exceptions and Questions 10-11): https://consultations.rbnz.govt.nz/rbnz/access-to-cash/user_uploads/keeping-cash-local-consultation-paper.pdf

[2] Reserve Bank of New Zealand, *Keeping cash local - additional background material* (25 February 2026), pp. 4-5 (straight-line method, rationale, first-stage road comparison and 95% stopping rule): https://consultations.rbnz.govt.nz/rbnz/access-to-cash/user_uploads/keeping

-cash-local-additional-background-material.pdf

[3] Reserve Bank of New Zealand, *Keeping cash local - district maps* (25 February 2026), pp. 5-7 and Appendix 2, p. 77 (Territorial Authority compliance, possible under- and over-provision, actual location choices and omitted places): https://consultations.rbnz.govt.nz/rbnz/access-to-cash/user_uploads/keeping-cash-local-district-maps.pdf

[4] Stats NZ, *Statistical standard for geographic areas 2023 (updated December 2023)* (December 2023), pp. 25-26 (documented domestic routing precedent using OSRM/OpenStreetMap drive time and address-weighted origins for relevant small-urban and rural SA1s): https://www.stats.govt.nz/assets/Methods/Statistical-standard-for-geographic-areas-2023/statistical-standard-for-geographic-areas-2023-updated-december-2023.pdf

[5] Litmus, *Research on cash use and access in ten rural towns*, prepared for the Reserve Bank of New Zealand (13 November 2025), pp. 3, 12-14 and 30-34 (study scope and limitations; journey, transport, mobility and service-type evidence among participants): https://consultations.rbnz.govt.nz/rbnz/access-to-cash/user_uploads/litmus-research-on-cash-use-and-access-in-rural-towns.pdf