

Submission on *Keeping cash local* - *public consultation paper*

Access to cash consultation - Questions 10 and 11

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Capacity: Personal capacity

Location: London, United Kingdom

Prepared: 31 July 2026

Scope

I write from London in a personal capacity and confine my response to how an exception to the standard should be measured, evidenced and recorded. This response does not rely on, or claim, New Zealand cash-system operating experience or a community mandate, and I do not offer a view about the needs of any named place.

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. The proposed standard already permits the site-number requirement to be met by the equivalent using partial service sites, but the published material does not state the conversion basis. RBNZ should publish that basis and show that it delivers an equivalent customer outcome, so a partial service is not counted as full-service access by default.[1] 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. Provision cost shapes which response is proportionate; it does not establish that an access need is absent.

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.

Community characteristics should be used to flag where effects may fall unevenly. They are not 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, 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 snowball sampling 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 route-sensitivity check

I have not carried out an independent route analysis. RBNZ deliberately uses straight-line distance in its illustrative analysis, citing 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 shows how a New Zealand public body documents 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

RBNZ's April 2026 supplement records that its current preferred option is a voluntary standard rather than a regulation or statutory requirement, and that if a voluntary standard cannot be put in place it would investigate statutory options under the current law.[6] The record proposed here should apply under either option. 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, error-correction process 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.

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

Proportionality

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-checking and audit costs.

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, illustrative district footprints with actual locations left to bank implementation decisions, possible under- and over-provision 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 method 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, 8, 12-14 and 30-34 (study scope, sampling method 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
- [6] Reserve Bank of New Zealand, *Keeping cash local - Legal basis for proposed cash standard* (24 April 2026), pp. 2 and 4-5 (supplement to the consultation paper; preferred voluntary standard and the statutory options under the Deposit Takers Act 2023):
https://consultations.rbnz.govt.nz/rbnz/access-to-cash/user_uploads/legal-basis-for-proposed-cash-standard-1.pdf