Property Receipts Levy

Form of calculation and mechanism for debate at Synod

(A report from the Standing Committee.)

Key Points

- At its session in 2017, the Synod requested the Standing Committee to implement a Property Receipts Levy (PRL) based on net property income. However, the Bill for an ordinance intended to give effect to this request was referred to the Synod by three members of the Standing Committee.
- The Diocesan Resources Committee (DRC) subsequently suggested that an alternative form of Bill for the PRL, based on gross property income, should be considered by the Synod rather than a PRL based on net property income.
- For the sake of efficiently considering the matter at Synod, it is proposed that the Synod hold a set-piece debate on whether the levy should be based on gross property income, with those speaking for and those speaking against the motion being given equal opportunity to present their case. Following the conclusion of the in principal motion, Synod would move immediately to consider the relevant Bill for an ordinance to implement the PRL.

Purpose

1. The purpose of this report is to provide two options for a Bill to implement a Property Receipts Levy, along with suitable explanatory reports and a proposed mechanism for debate at Synod.

Recommendations

2. Synod receive this report.

3. That Synod consider the following motion to be moved at the forthcoming session of Synod "by the request of Standing Committee" –

> 'Synod, noting the report "Property Receipts Levy" (the Report) and Synod's resolution 34/17, nevertheless agrees in principle that a Property Receipts Levy based on gross property income should be implemented'.

4. That Synod consider the following procedural motion to be moved at the forthcoming session of the Synod "by request of the Standing Committee" –

> "Synod, for the purpose of considering the motion regarding the Property Receipts Levy and a Bill for an ordinance to implement the Property Receipts Levy, agrees to the following arrangements –
>
> (a) debate on the motion to be scheduled for immediately following the dinner break on Tuesday 16 October 2018,
>
> (b) the mover and seconder of the motion may combine for a joint presentation for up to 10 minutes,
>
> (c) the Rev Craig Roberts and Bishop Michael Stead may provide a joint presentation for up to 10 minutes opposing the motion immediately after the mover and seconder have spoken,
>
> (d) a time for questions is to follow, where the questions may be answered by any of the mover or seconder, or Mr Roberts or Bishop Stead, as appropriate to the question,
>
> (e) following the conclusion of debate on the motion the mover and seconder are to be allowed up to five minutes for summation, followed which Mr Roberts and Bishop Stead are to be allowed up to five minutes for summation,
>
> (f) following the conclusion of consideration of the motion –
>
> (i) if the motion is carried in a form that expresses Synod's support for a levy based on gross property income, to consider forthwith the Bill for an ordinance to implement the Property Receipts Levy based on Gross property income rather than the alternative Bill, or
>
> (ii) if the motion is not carried, or is carried in an amended form expressing Synod's support for a levy based on Net property income, to consider forthwith the form

of Bill for an ordinance to implement the PRL based on Net property income, incorporating the amendments recommended by the Standing Committee, and

suspends so many of the business rules that would prevent these arrangements."

Background

5. At its session in 2017 the Synod considered the proposed Property Receipts Levy, informed by the report at Attachment 1, and passed resolution 34/17 in the following terms –

'Synod, noting the report "Proposal for a Property Receipts Levy" –

(a) affirms the principle that the proposed levy should apply only to parish property income,

(b) agrees that a property levy should be applied against net, rather than gross, property income because of the theological principle of "a sharing out of surplus",

(c) agrees in principle, that –

 (i) offertory income (including regular giving, donations, bequests etc) should be used to meet the stipend, allowances and benefits of the minister of the parish and, to the extent possible, other recurrent ministry expenditure of the parish (including maintenance of non-income producing property),

 (ii) property income should first be used to meet property expenditure, including the maintenance of buildings and adequate provision for future capital expenditure on commercial property before it is used to support recurrent ministry expenditure, and

 (iii) a proportion of a parish's surplus property income (i.e., non-offertory income) should be shared with the wider Diocese,

(d) supports in principle a Property Receipts Levy ("PRL") as outlined in the report and attached schedule subject to –

 (i) a deduction being provided for bank and financial statutory charges, taxes and assessments on finance income, and

 (ii) the Standing Committee being restricted from increasing any percentage or modifying any monetary thresholds without authorisation from the Synod,

 (iii) parishes with net receipts of $120,000 or less being totally excluded from this levy, and

(e) requests the Standing Committee to pass an ordinance to implement a PRL with respect to property income from 2018.'

Preparation of a Bill to implement the PRL

Delegation to the Diocesan Resources Committee

6. At its meeting on 13 November 2017, the Standing Committee requested the Diocesan Resources Committee (DRC) to arrange for a suitable ordinance to implement the Property Receipts Levy to be brought to a future meeting.

Variation of terms of the proposed levy

7. At its meeting on 12 February 2018, the Standing Committee received a report from the DRC, regarding the preparation of a Bill to implement the levy. The following is an extract from that report –

'…the Committee notes that two particular elements of the proposed calculation of net property income appear likely to involve a disproportionate amount of effort to calculate compared with their expected impact in reducing the amount of a parish's net property income.

The first of these elements is the amount of the property insurance component of the Parochial Cost Recovery (PCR) charge applicable to each property. This amount is not readily available at present. In fact, it is not possible to calculate the exact amount of the property insurance component of the PCR charge applicable to each property. To get around this problem the draft Ordinance has proposed to use the formula A x B x C to arrive at a reasonable estimate of the property insurance cost for each leased property, where –

"A" = the parochial network costs for the parish (to be determined by the parish from account 6-1900, after excluding the Ministry On-costs which should be shown at 6-1170).

"B" = the total cost of the Diocesan parish property insurance program expressed as a percentage of parochial network costs for the whole Diocese (the Finance Committee has calculated this figure to be 34% for 2018).

"C" = the insurance replacement value of the leased property in question expressed as a percentage of the insurance replacement value of all parish property (to be calculated by the parish based on the ACPT's building insurance valuation summaries).

The second element of the calculation the Committee is questioning is the deduction provided for bank and financial statutory charges, taxes and assessments on finance income. In practice it would seem this deduction could sensibly be limited to bank charges as there are in fact no statutory financial charges or other taxes or assessments on finance income payable in NSW. A new account (6-5120) would be required to isolate bank charges for the purposes of the calculation of net property income.

Both the property insurance component of the PCR charge and the bank charges are likely to be relatively small amounts compared with the amount of any rental income from property or investment income and so the impact of these two elements on the calculation of net property income and hence on the amount of any levy payable by the parish is likely to be minimal. In fact the Committee estimates that the amount of the levy to be saved by the deduction proposed for these two elements would be less than the cost of calculating the deduction.

The Committee therefore recommends that the property insurance component of the PCR charge and the bank charges paid be removed from the list of elements to be deducted from the gross property income of a parish for the purposes of the Property Receipts Levy Ordinance.'

8. In line with the recommendation from the DRC, the Standing Committee asked the DRC to prepare the Bill for the Property Receipts Levy in a form that did not include any deduction for –

(a) the property insurance component of the Parochial Cost Recoveries charge applicable to each property, and

(b) the bank and financial statutory charges, taxes and assessments on finance income paid by a parish,

and did so with the expectation of providing a report to the Synod outlining the rationale for its departure from the Synod resolution.

Referral of the Bill to the Synod by three members of Standing Committee

9. The Standing Committee was due to consider the Bill for the PRL at its meeting on 26 March 2018. Before consideration of the Bill commenced, three members of the Standing Committee requested in writing to the Archbishop, that the Bill be referred to the Synod in accordance with 5(3)(b) of the *Delegation of Powers Ordinance 1998*.

10. The principal objection of the three members to Standing Committee's consideration of the Bill was that the insurance issue hadn't been adequately dealt with as per Synod's request in the resolution.

11. In order to allow the Synod to express its will with regard to the issue of a deduction for the property insurance component of the PCR charge, the Standing Committee has suggested the introduction of a deduction for insurance using a standard formula to determine the deduction. This approach is significantly more efficient than the original proposal, simply calculating the extra amount paid by each parish as a result of their property income, and making that amount a deduction. The formula is as follows. Where –

X = (property insurance component of network costs) / (network costs) [32% for 2018]

Y = PCR Charge [$ varies per parish]

Z = (parish property income) / (total Net Operating Receipts) [% varies per parish]

The resulting Deduction = X x Y x Z.

12. This amendment to the Bill for an ordinance to implement the PRL based on net property income will be provided on the amendment sheet with Synod's business paper for day 1 and would apply only to the Bill to implement the PRL based on net property income.

Amendments to the referred Bill

13. Following the referral of the Bill to Synod, the Standing Committee determined that there were several amendments which should be made to the Bill, either out of necessity due to timing or to improve the function of the levy. These amendments had in large part been intended for consideration by the Standing Committee at its meeting on 26 March 2018, but the Standing Committee was prevented from considering them by the referral of the matter to Synod. A marked form of the Bill (the referred form of the Bill amended to show the recommended changes) with explanatory report, including a discussion of the amendments, is printed separately.

Alternative Bill to enact a levy based on gross property income

14. At its meeting on 14 May 2018, the Standing Committee noted that the DRC intended to provide a version of the Bill for a PRL based on gross property income, rather than net property income to a future meeting. The DRC has provided a Bill with an explanatory report which are printed separately.

15. In order to support the debate on the form of levy, Attachment 2 to this report includes a brief summation of the reasons to consider a levy based on gross property income, as well as a separate summation of the reasons to consider a levy based on net property income.

Synod's consideration of the alternative forms of Bill

16. Standing Committee recommends that the Synod hold an in-principle debate as to whether the levy should be based on gross rather than net property income, before moving on to consider the detail of (only) one of the Bills. The proposed form of this debate is set out in the recommendations of this report.

For and on behalf of the Standing Committee.

DANIEL GLYNN
Diocesan Secretary

27 September 2018

Attachment 1

Proposal for a Property Receipts Levy

(A report of the Standing Committee.)

Key Points

- There is a Scriptural basis for the sharing of parish property income: where there are churches who are in circumstances of "plenty", it is appropriate to encourage them to share this blessing with those who are in need elsewhere.
- A Property Receipts Levy is considered preferable to the existing Large Receipts Policy with regard to property income because of its inherent transparency and equity. If the proposed levy is adopted by Synod, the Standing Committee intends adopting a revised form of the Large Property Receipts Policy contemplated by Synod in 2015 (shown in Appendix 3) with regard to proceeds from the sale of parish property.
- In line with the theological foundation of the levy being found in "sharing out of surplus", the proposed levy applies to property income **net** of property expenses related to that income-producing property. This ensures that parishes with income-producing properties that are more expensive to maintain are not unduly levied, while all parishes are able to steward their income-producing properties using the income from those properties prior to the levy being applied.
- It is desirable to ensure that any proposal to shift monies away from well-endowed parishes is accompanied by a compelling vision as to how those monies will be applied to gospel purposes.

Purpose

1. The purpose of this report is to provide relevant information regarding a proposal to implement a Property Receipts Levy in place of the current Large Receipts Policy of the Standing Committee.

Recommendations

2. That Synod receive this report.

3. That Synod consider the following motion to be moved "by request of Standing Committee" –

'Synod, noting the report "Proposal for a Property Receipts Levy" –

(a) affirms the principle that the proposed levy should apply only to parish property income,

(b) agrees that a property levy should be applied against net, rather than gross, property income because of the theological principle of "a sharing out of surplus",

(c) agrees in principle, that –

(i) offertory income (including regular giving, donations, bequests etc) should be used to meet the stipend, allowances and benefits of the minister of the parish and, to the extent possible, other recurrent ministry expenditure of the parish (including maintenance of non-income producing property),

(ii) property income should first be used to meet property expenditure, including the maintenance of buildings and adequate provision for future capital expenditure on commercial property before it is used to support recurrent ministry expenditure, and

(iii) a proportion of a parish's surplus property income (i.e., non-offertory income) should be shared with the wider Diocese,

(d) supports in principle a Property Receipts Levy ("PRL") as outlined in the report and attached schedule, and

(e) requests the Standing Committee to pass an ordinance to implement a PRL with respect to property income from 2018.'

4. That Synod not consider any amendments which are likely to give rise to material changes to the structure of the proposed Property Receipts Levy unless modelling is available to show the effect of the proposed amendment.

Background

Historical background

5. This Diocese has had a policy relating to large receipts since 1960, when it established a "Special Receipts Committee" in response to the following recommendation of the Property Trust –

> "That in cases where parishes are to have greatly enhanced receipts and such amounts are, in fact beyond the reasonable needs of the parish, then the surplus should be allocated for other parishes etc and/or diocesan objectives."

6. This policy position was ultimately reflected in regulations made by the Standing Committee and became known as the Large Receipts Policy ("LRP"). The sale threshold, beyond which the policy applied, was set at $100,000 in 1975, which was gradually increased to its current level of $500,000 in 2004. Similarly, a threshold for lease income was set at $20,000 pa in 1997 and has been increased over time to its current threshold of $50,000 pa (set in 2012). At its meeting on 19 September 2016, the Standing Committee modified the LRP so that the LRP would also be triggered by a bill for an ordinance with the expectation of investment income exceeding $50,000 pa.

7. The rationale for the LRP arises from the character of the trusts on which all property is held for every parish: church trusts are not private trusts for the benefit of individual beneficiaries or even for the group of persons who meet and exercise ministry on that property at a particular time. Rather, they are charitable trusts under which the property is devoted to designated purposes of the Diocese in perpetuity, subject to a power to vary those trusts under section 32 of the Anglican Church of Australia Trust Property Act 1917.

Characteristics of the current Large Receipts Policy

8. The current LRP broadly provides that where the expected sale proceeds from parish property will exceed $500,000 or where the expected lease or investment proceeds will exceed $50,000 pa, the normal expectation is that 15% of the proceeds will be made available for the broader ministry needs of the Diocese. The policy also provides that a higher percentage may be appropriate if the large receipt from a sale exceeds $1,000,000.

9. As an indication of the volume of funds generated through the LRP, sale contributions under the LRP each year generates in the order of $450,000, although this fluctuates dramatically. Lease contributions under the LRP have contributed –

(a) an average $1,131,000 per annum over the last six years to the Synod budget (between 20% and 25% of the income in the Synod budget), and

(b) in the order of $250,000 per annum directly to other ministries in the Diocese.

10. There are several reasons why the current policy has proved unsatisfactory –

(a) The sale threshold is set at such a level that almost every property sale triggers the policy.

(b) The 15% amount is presented as a flat contribution against the whole of the sale, lease or investment proceeds with no provision for offsets or expenses that would reasonably be excluded from the income figure before a contribution is expected.

(c) It is now common practice for a leasing authority for church trust property to be provided within a trust ordinance, rather than a specific parish leasing ordinance. This raises issues of interpretation of the LRP as to whether these trust ordinances constitute a bill for an ordinance that triggers the LRP.

(d) There is a similar interpretation issue when a bill for a trust ordinance will authorise multiple leases that in aggregate exceed the LRP. As one ordinance is being presented, one interpretation of the LRP is that the LRP should then apply to the aggregate of the leases.

(e) Licence income is excluded from the policy, yet many parishes receive licence income that far exceeds the LRP threshold.

11. For various reasons, it has become common when a parish submits a bill for an ordinance for lease or sale of a property to seek a partial or full exemption from the application of the policy. This has led to a perception that the policy is applied inconsistently and therefore is unpredictable in its operation.

LPRP approved in principle at Synod in 2014

12. Out of a desire to address these problems, the Standing Committee promoted to the Synod in October 2014 a proposed Large Property Receipts Policy ("LPRP"). The LPRP specified that contribution amounts should only apply after the "reasonable property needs" of the parish have been met. The concept of "reasonable property needs" was not extensively defined in the LPRP however the LPRP contemplated that further clarity as to the meaning of reasonable property needs would be provided by guidelines

prepared by the Standing Committee. The LPRP also introduced progressive contribution bands for sale and lease income, rather than a single contribution percentage.

13. Although the Synod approved the LPRP in principle in October 2014, it requested that the Standing Committee consult with parishes and bring a revised form of the LPRP to the 2015 session of Synod taking into account feedback received during the consultation.

Proposal for a levy requested by Synod in 2015

14. The Standing Committee duly prepared a revised form of policy for Synod in 2015 which if adopted, would among other things, increase the large property receipts thresholds in the policy and provide that the Standing Committee would be guided by the parish in determining its reasonable property needs. However, the Standing Committee also indicated to the Synod that a Property Receipts Levy ("PRL") may be preferable to a Large Property Receipts Policy. Accordingly, Synod resolution 22/15 was carried in the following terms –

'Synod –

(i) noting the Large Property Receipts Policy ("LPRP") approved in principle at its last session in October 2014,

(ii) noting its request that the Standing Committee consult with parishes about the LPRP with a view to bringing a revised form to this session,

(iii) noting the revised form of the LPRP included in the Standing Committee's report to Synod on this matter ("Report") together with an outline of a possible Property Receipts Levy as an alternative to the LPRP,

(iv) noting that during the consultation process some parishes indicated a preference for a form of Property Receipts Levy instead of a LPRP,

agrees that a Property Receipts Levy along the lines described in the Report may be preferable to a LPRP, and therefore requests the Standing Committee to collect the necessary financial data from parishes, and undertake the necessary modelling and further consultation to bring to the Synod no later than its session in 2020 a proposal for a Property Receipts Levy to be considered as an alternative to a LPRP.'

Synod in 2016 requests options for the levy that results in significant additional funding

15. At its ordinary session in 2016, the Synod passed resolution 4/16 in the following terms, giving further guidance regarding the form of levy –

'Synod, noting the report "Funding church planting in urban areas" –

(a) recommends that the Regional Bishops and the Department of Evangelism and New Churches ("ENC") encourage and facilitate inter-parochial partnerships, where needed, to allow larger churches to resource the planting of churches in urban areas,

(b) requests the Large Property Receipts Policy Committee, when presenting the proposed Property Receipts Levy, to include in its modelling an option that provides significant additional funding for ministry initiatives, and

(c) agrees that if additional funding were provided through a Property Receipts Levy, additional funding for ENC is worthy of strong consideration in order to support church planting initiatives in urban areas.'

Appointment of a subcommittee

16. The Standing Committee tasked a committee ("the committee") comprising the Rev Craig Roberts (Chair), Bishop Michael Stead and Mr Geoff Kyngdon to collect financial data from parishes and undertake some financial modelling in order to propose a Property Receipts Levy. In doing so, the committee has considered as its starting point the primary theological principles relevant to consideration of this matter, and produced a brief outline of these principles in the following section of this report.

Theological Principles

17. There are four theological principles that are important to our consideration of the existing Large Receipts Policy and any proposed replacement: Generosity, equality, stewardship, and equity with transparency.

Generosity in fellowship

18. It is sometimes argued that there should not be any compulsory levies on church income, because this goes against the New Testament principle of generosity, as expressed in 2 Cor 9:7 – "Each should give

what he has decided in his heart to give, not reluctantly or under compulsion, for God loves a cheerful giver".

19. However, the principle of generosity is also a key justification for two existing diocesan financial structures –

(a) The existing Large Receipts Policy ("LRP"), which encourages generosity within the local congregation, because the local congregation needs to provide the financial support for its minister, rather than be reliant on non-offertory income to fund its ministries. A large receipts policy encourages a local congregation to give generously to support the work of local ministry, because "the worker is worth his keep" (Matt 10:10, cf. 1 Tim 5:17-18).

(b) The Greenfield levy, which we as a Diocese, through legislated generosity, bound ourselves to.

20. In both cases, the Diocese committed to these forms of legislated generosity, as a natural outworking of our common identity and mission in Christ.

Equality (Sharing the "plenty")

21. Paul's encouragement to the church at Corinth to contribute to a collection for the sake of other churches in need was based on the principle of equality. The "plenty" experienced by one congregation was not something to be hoarded selfishly, but rather something to be recognised as a provision from God to be used for the sake of others in need.

> Our desire is not that others might be relieved while you are hard pressed, but that there might be equality. At the present time your plenty will supply what they need, so that in turn their plenty will supply what you need. Then there will be equality, as it is written: "He who gathered much did not have too much, and he who gathered little did not have too little."(2 Cor 8:13-15)

22. God has blessed us in order for us to be able to be a blessing to others. Where there are churches who are in circumstances of "plenty", it is appropriate to encourage them to sharing this blessing with those who are in need elsewhere.

Stewardship

23. The New Testament encourages us to be good stewards who consider that "our" material riches are in fact resources entrusted to us by our heavenly master, to be used for his purposes and for which we are accountable to him (Matt 25:14-30; Luke 19:12-27, cf. Luke 16:1-13). For those entrusted or endowed with more, more is expected.

> From everyone who has been given much, much will be demanded; and from the one who has been entrusted with much, much more will be asked. (Luke 12:48)

24. Where a parish has significant non-offertory income streams generated by the capital assets entrusted to it, it is appropriate that proportionately more should be expected from the parish to provide for other parishes who have not been entrusted with as much.

Equity with Transparency

25. The three principles above underpin the existing LRP. There is a fourth principle that indicates the need for a modification to the existing policy – that of equity with transparency. There is a degree of inequity in the way that the existing LRP applies to parishes. The LRP is a policy of Standing Committee that applies to property sale and leasing ordinances. It does not apply to income received from licences not subject to an ordinance. This means that Parish A, which receives (say) annual ***lease*** income of $90,000 is subject to the LRP, whereas Parish B, which also receives (say) $90,000 p.a. by way of two ***licences*** for $45,000 is not subject to the LRP. This is an inequity in our system that needs to be addressed.

26. Furthermore, the subjective basis of the existing LRP does not always lead to a consistency of outcomes. The current LRP relies on an assessment of a parish's "reasonable property needs" and what constitutes a "windfall gain", both of which are open to subjectivity and inconsistent application. The proposed levy is a straight-forward mathematical formula that applies to parishes consistently across the board, and allows each parish to readily determine the impact of the levy on its affairs. This liberates parish leadership from wrestling with definitions and allows everyone to anticipate the precise impact of the policy well in advance.

Considerations of a levy vs a policy

Benefits of a levy vs. a policy

27. One of the principal reasons for considering a levy flowed from the desire to share among more parishes the responsibility for contributing to Synod funded ministry. Currently, four parishes provide 96% of lease contributions to the Synod budget. A levy is able to be administered simply (alongside the parish

cost recoveries [“PCR”]) and so allows all parishes with property income to contribute efficiently. It is not expected that the amount contributed by the current four largest contributors would vary significantly, but would be supplemented by contributions from all parishes.

28. As noted above, the practice of parishes seeking a partial or full exemption from the application of the existing policy has resulted in the perception that the policy may be applied inconsistently or may be unpredictable in its operation. The proposed levy is intended to be a simple application to all non-offertory income, and so consistent and transparent in its operation.

29. The existing policy has created uncertainty, particularly as an increasing number of leases are authorised by a single trust ordinance. The existing policy leaves open for interpretation the question of whether a trust ordinance that provides for multiple leases should trigger the LRP, and creates inequality for parishes who use the preferred vehicle of a trust ordinance, rather than separate leasing ordinances. In contrast, the proposed levy does not discriminate between lease and licence income in a parish, and provides certainty around how parishes will contribute to the wider work of the diocese.

30. The current policy has a single, prescribed contribution amount, which does not address the varying levels of property income among parishes, and has resulted in the situation where it is exceptional that a parish contributes the prescribed amount. The levy incorporates progressive contribution bands which provide opportunity to establish a contribution-free threshold and successive contribution levels that represent the will of the Synod with regard to proportional giving.

31. The process by which parishes seek exemption requires significant discussion and reporting, followed by debate at Standing Committee. Accordingly, the process of administering the policy becomes quite time consuming for all involved, and is still prone to the perception of being inequitable and opaque. By contrast, the proposed levy is administratively simple and is to be applied without variation due to circumstance, so is expected to be equitable as well as efficient.

Property Receipts Levy characteristics

32. There are a number of key issues that have been raised and considered during the consultation process held over a number of years, which have contributed to the design of the proposed levy. These are briefly outlined below.

A levy on property income

33. The proposed levy is intended to apply to recurring income rather than proceeds from the sale of property. In the event that Synod adopts the proposed levy, the Standing Committee intends adopting an amended form of the Large Property Receipts Policy considered by Synod in 2015 as shown in marked form in Appendix 3.

34. There are two types of income that parishes may receive –

(a) Through the generosity of the current parishioners, all parishes receive offertory (which for the purposes of this paper is defined widely, to include bequests and other donations, including large one-off donations).

(b) Some parishes receive income from land and buildings, or interest and investments. This is known as “property income” and is available to those parishes as a result of the generosity of previous generations and the advantages of geography. Parishes with property income may have substantial assets and the opportunity to generate significant additional income. The proposed PRL is intended to apply only to property income, as a means of redistributing wealth throughout the diocese.

35. With respect to the PRL, a parish’s “property” includes both its real property (land and building assets) and its personal property (investment assets, e.g., trust funds, term deposits). The levy will apply equally to income generated from both classes of assets. To do otherwise (for example, to exempt investment income as was suggested in feedback sessions) would discourage parishes from investing in their real property. Whether a parish has a property generating lease income, or whether the property is sold and the proceeds invested, the levy will apply regardless. Applying to both forms of property income is also demonstrably more equitable and transparent.

Application to property income net of related expenses

36. A levy could be applied either to the gross property income of a parish, or to a parish’s property income net of related expenses. Applying the levy to the gross amount would have the advantages of being simpler to administer and easier to forecast the amount of funds raised by the levy. However, given that the theological foundation of the levy is found in “sharing out of surplus”, the form of proposed levy recommended by the committee applies to property income **net** of property expenses related to that income-producing property.

37. Applying the levy to net property income rather than gross property income also ensures that parishes with income-producing properties that are more expensive to maintain are not unduly levied. For example, consider two parishes, each with a property generating income of $100,000 p.a. One parish may have related property expenses (including mortgage repayments) of $80,000 p.a. which means that the net income to the parish is only $20,000 p.a. The other parish has relatively few expenses (say $10,000 p.a.), and receives a net income of $90,000 p.a. If the levy were applied against gross income, both parishes would be expected to contribute the same amount, with the first parish drawing from net income of only $20,000 while the second can draw from net income of $90,000. However, if applied against net income, each parish contributes in proportion to their net income received. This satisfies the principles of “equality” and “equity”.

38. Applying the levy to net property income rather than the gross property income allows parishes to steward their income-producing properties using the income from those properties prior to the levy being applied. It was felt appropriate that the maintenance and improvement of income-producing properties should be able to be paid for with the income prior to any levy being applied.

39. Applying the levy to net property income rather than gross also allows the proposed levy to address many of the concerns raised during consultations with parishes. Following consultation with parishes, the Committee identified that the following expenses should be considered as deductible –

(a) principal and interest portions of mortgage repayments on income-generating properties,

(b) lease payments for a place of public worship (for example, if a parish uses property income to finance the rent it pays for a leased church meeting place), and

(c) mortgage repayments, lease payments or housing allowances for a residence for ministry staff where there is a corresponding residential property owned by the parish that is generating lease income (for example, where a ministry residence owned by a parish is unsuitable for its purpose and is rented out in order to fund the leasing of another residence for a minister).

The Standing Committee subsequently added the following further category of deductible expense –

(d) property insurance component of the Parish Cost Recovery (PCR) charge.

40. It is expected that the deduction for expenses from income producing property is capped at the amount of the total income from that property - i.e., parishes are not allowed to offset "pooled expenses" against "pooled income". For example, consider a parish with a hall and a residence both generating property income. The hall attracts $10,000 of property income with related property expenses of $50,000; while the residence generates $42,000 in income, with related property expenses of $5,000.

	Hall		Residence
Net property income =	$10,000- $10,000 (Capped)	+	$42,000 - $5,000 = $37,000

41. The intention of this aspect of the policy is to ensure equity across parishes in the application of the policy.

42. By allowing reasonable expenses to be offset, parishes are not penalised for appropriate financial decisions or decisions made for the care of their staff. For example, if a parish leased out a residence that was not suitable for their ministry staff and used the income to pay a housing allowance, it would seem unreasonable for any portion of the income that is used towards the housing allowance to attract the levy. Similarly, if a parish does not have a suitable property in which to conduct its public ministry, but uses property income to fund the rental of a suitable place of public worship, it would seem unreasonable to levy any portion of that property income that is needed to fund the rental of the place of worship.

Limiting the amount of expenses that may be offset

43. Consideration was given to applying the levy to property income net of all property related expenses, including expenses for ministry properties. While this may seem attractive in terms of using property income to maintain property, such a mechanism will have a number of unreasonable consequences which render this option unworkable and as such has not been pursued –

(a) All parishes need to maintain their ministry properties whether they have property income or not. Where a parish is fully utilising its properties for ministry purposes, it has no other income sources to maintain and improve its properties, and this must be fully funded by the congregation. Such a mechanism would give further advantage to parishes that have property income, allowing ministry property expenses to offset levy contributions.

(b) Such a mechanism would favour parishes with larger property income: consider two parishes with similar property income where the first can afford to use the property income to maintain the ministry property, while the other parish needs the property income to supplement other

ministry costs. In this example the first parish would be able to offset all of their property income and contribute $0 to the levy; while the parish in greater need will contribute the full portion of the levy.

(c) There is significant capacity for most parishes to spend on ministry property and totally offset any property income. In 2015, parishes in the Diocese spent in total more than ten times as much on ministry property than on income producing property. One result of this reality is that the number of parishes contributing anything through the levy would be expected to dramatically reduce, meaning that a larger burden will be placed on a smaller number of parishes.

(d) The purpose of the levy is to share among more parishes the responsibility for contributing to Synod funded ministry. The levy must be by some measure predictable, because ministries funded by the Synod will rely on the proceeds of the levy. Introducing the possibility that parishes may offset ministry property expenses to reduce their contribution to the levy has potential to significantly change spending patterns and ultimately introduces a level of unpredictability that will make the levy unworkable.

Modelling of application of the levy

44. It is anticipated that Synod may be desire to test the application of the levy against gross property income, or in an expanded form of net income that allows expenditure on ministry property to be offset. Accordingly, to outline the possibilities and demonstrate the likely required contribution bands under different models, appendix 4 outlines three different models of levy application, as well as indicative contribution amounts from each parish under each model.

Efficient administration of the levy

45. In order for the proposed levy to be administered efficiently, existing categories of income and expenditure currently used in the Prescribed Financial Statements (“PFS”) have been employed to define net property income and it is intended that the levy contributions be calculated from audited financial statements submitted by parishes each year in a similar fashion to the Parish Cost Recoveries.

46. While total property income can easily be identified from existing categories in the PFS (4-3000 and 4-5000), and “Expenses for property lease income” (6-7000) captures most expenses related to property income, the other expenses identified as deductible in paragraphs 39 are not currently captured by a unique account code in PFS. It is intended that these additional categories will be assigned unique account codes in the PFS so that parishes can report these amounts in their annual financial returns.

Consistent application of levy, with option to remain under ordinance

47. The theological principles of equality and equity with transparency suggest that the proposed levy should apply as uniformly as possible, and involve as simple a calculation as possible. In order to achieve this, the proposed levy avoids any reference to “reasonable property needs” and allows certain deductions to all parishes, with no place for “special case” exemptions. It is expected that this will result in greater efficiency and integrity of administration of the levy.

48. Many parishes have an ordinance that sets out the percentage contribution from existing lease income. These ordinances will continue to operate on their current terms until the expiry date of the ordinance. The PRL would not apply to lease income which is already levied in some manner under ordinances (i.e., there is no “double taxation”). Parishes will have the option to renew their ordinances on expiry, and parishes not currently subject to special arrangements will have the option to seek special arrangements via an ordinance.

49. It is anticipated that Standing Committee would consider such ordinance conditions in light of the contribution that would otherwise be made under the levy, and then to take into account any exceptional circumstances in the parish. The committee expects that this approach will allow a gradual transition to a levy-based approach that will not jeopardise ministries which are currently funded through present ordinance arrangements. At the same time, the option for special arrangements via ordinance allows flexibility for genuinely exceptional circumstances.

Creation of a sinking fund as an allowable property expense in arriving at net property income

50. Consideration was given to treating any funds that a parish sets aside for future expenses (in a sinking fund) related to property income, as an additional form of property expense (and consequently reducing the amount of income upon which the parish is levied). This approach would likely have the benefit of encouraging parishes to set aside funds for their future property needs, but would also add an additional level of complexity, while reducing the predictability of the level of income from the levy.

51. Ultimately, given the desire to apply the levy with equity and transparency, it was felt that this is better achieved with a simple levy applied on the income after actual costs only are taken into consideration. This also has the additional benefit of neither advantaging nor disadvantaging any parishes over others.

52. It was also noted that the PCR does not allow for a sinking fund type offset in calculations for the PCR, and suggested that the levy is best applied on the same principles as the PCR. Consequently, if exemptions for funds added to a sinking fund are worthy of pursuit, it would be more appropriate to consider these in conjunction with the net operating receipts rather than being applied only to this proposed levy.

The effect of a property levy in addition to the PCR and Greenfields Land levy

53. Each parish's property income is already being assessed alongside their offertory income through the Parish Cost Recoveries and the Greenfields Land levy. The proposed contribution rates have been set mindful of this economic reality.

Forecast proceeds of the levy

54. Various modelling has been used to determine the likely income from this proposed levy, with the expectation that this proposal should result in a net increase of at least $500,000 p.a. available for ministry funding. This arises from the expectation that those parishes who currently contribute will not give substantially less, while many other parishes will provide contributions in addition to the amounts currently received. However, this forecast income cannot be viewed as anything more than an indication, for several reasons –

(a) The modelling has necessarily relied on data from parishes in 2015, whereas the levy could only reasonably commence using accounts from 2018 at the earliest. Significant changes will have occurred in those intervening years.

(b) The current PFS accounts provided by parishes do not specify certain types of expenses which will be deductable for the purpose of calculating the levy (e.g., mortgage repayments on income producing properties).

(c) The proposed levy may encourage parishes to spend more on the maintenance of their income-producing properties, which will reduce the amount to which the levy would apply.

55. By Synod resolution 4/16, the Synod expressed its recognition that additional funds may be generated through the proposed PRL, and asked the Committee to provide an option in its modelling that would generate significant additional funding for ministry initiatives. The resolution went on to identify Evangelism and New Churches as worthy of strong consideration as a recipient of additional funding if additional funding became available through the proposed levy.

Application of funds

56. It is outside the terms of reference of the committee to develop a detailed proposal for the use of the additional funds generated by the proposed PRL. However, the committee recommends that the following principles should be present in any proposal for application of funds generated by the proposed levy –

(a) Existing Synod commitments should be maintained: The current LPRL and/or ordinance variations currently generates in excess of $1m per annum, which funds a range of ministry initiatives. This funding should be maintained, and the framework below is only to apply to "additional" funds raised by the PRL above an agreed benchmark figure.

(b) Funds derived from capital assets should be used to build the capital base of the Diocese: The PRL funds have been derived from capital assets and as a matter of principle, should be used to build the capital base of the Diocese. We therefore do not recommend that the funds used "to support church planting initiatives in urban areas" (as per Synod resolution 4/16).

(c) Funds derived from the PRL should be used for the benefit of existing urban areas of the Diocese: The PRL funds should be used to stimulate property development for parishes in urban areas. This fills the obvious gap in our Diocesan Property strategy. We currently have a Greenfields levy and NCNC as a strategy for church expansion in the developing areas of Sydney (where 30% of the population growth is projected to occur) but no strategy to support church expansion in the rest of the diocese (where 70% of the growth is projected to occur).

57. The committee has become aware of the proposal of the Mission Property Committee to provide guidance to parishes undertaking Brownfields projects, which will require significant funding. The committee is of the view that such a proposal is consistent with the principles outlined above, and strong consideration should be given to funding that proposal with the proceeds of the PRL.

58. The committee also suggests that any additional funds not required for the Synod budget and beyond the needs (up to a maximum of $500,000) of the MPC proposal for brownfield development, may be

provided as grants for capital development to fund urban renewal, and suggests the following framework as a mechanism to apply those funds –

(a) Grants to be administered by the Mission Property Committee (which may need to have its terms of reference and membership augmented accordingly).

(b) Any parish may apply for a dollar-for-dollar matching grant, on the following basis –

  (i) The parish must be able to contribute at least $50,000 from funds that it has raised internally for that project.

  (ii) There is no maximum project size, but the maximum grant is $250,000.

  (iii) Priority will be given to parishes that have not previously received a grant.

  (iv) Priority will be given to projects that increase ministry capacity (eg. expanded church, new hall) rather than projects which restore or maintain existing capital assets.

  (v) The Standing Committee may provide further guidelines to the MPC to assist it to assess the priory projects.

  (vi) The MPC will determine a list of priority projects in a given year.

(c) If there are insufficient funds for all priority projects, the grants are to be applied in proportion to the matching amount raised by the applicant parishes.

59. The intended effect of these principles is that parishes who have a sufficiently missional and supported project (as demonstrated by an ability to raise $50,000 or more internally) could expect to have that amount matched by the Diocese for their project.

60. The threshold of a $50,000 matching amount is intended to ensure that only projects of a certain size are provided grants and the scheme is not overwhelmed with applicants. A parish with a significantly larger project could apply for a grant up to $250,000 provided the parish could raise $250,000 internally. It is felt that these measures will be transparent, easy to administer, and should generally ensure that the funds raised go to worthy missional projects that have the backing of the congregations involved.

Commencement, phase in and review

61. If the proposed levy is passed in Synod in 2017, it will apply to income generated in 2018, which will be reported through the PFS in 2019, with the levy being paid in 2020.

62. It is expected that most parishes will contribute to the proposed levy. In order to minimise the impact on ministries, the proposed levy incorporates a phase-in period where –

(a) in the first year of application (i.e., 2020), contributions would only attract 33% of the normal levy contribution for each parish,

(b) in the second year (2021), contributions would attract 67% of the normal levy contribution, and

(c) in the third year, the full levy would apply for the first time.

63. The proposed levy should be reviewed 5 years after commencement, with subsequent review periods being set at that time.

For and on behalf of the Standing Committee.

THE REV CRAIG ROBERTS
Chair, Large Receipts Policy Review Committee

22 August 2017

SCHEDULE

Proposed Property Receipts Levy

Income to which the levy applies

1. A levy is applied at the rate set out in paragraph 4 to each parish's "net property income", unless the property income is already subject to contribution under ordinance.

2. Net property income is the total property income (from licences and leases on commercial and ministry residences, and from dividends, distributions and interest) net of expenses incurred for those income-generating properties, and other named deductions as set out below. The standard diocesan chart of accounts describes the relevant income as follows –

   4-3000 Property Income (lease rental from commercial and residential properties, licence fees and casual booking fees)

   4-5000 Finance income (bank interest, investment income and ACPT Client Fund income)

   6-7000 Expenses for Property lease income*, including costs and payments in relation to –

   6-7500 mortgage repayments on leased properties

   6-9000 Other expenses deductable for the purposes of this levy, including –

   6-9### leases for a place of public worship

   6-9### mortgage repayments, leases or allowances for a residence for ministry staff where there is a corresponding residential property owned by the parish that is attracting lease income in order to fund the ministry residence in use

   6-9### property insurance component of the Parish Cost Recovery ("PCR") charge.

   * A deduction for expenses from income producing property is capped at the amount of the total income from that property. i.e., parishes are not to offset "pooled property expenses" against "pooled property income".

3. The levy for each parish is calculated as follows = [4-3000] + [4-5000] – [6-7000] – [6-9000]

Contribution amounts

4. The following table sets out the rate at which the levy is applied –

Net property income	% Levy to be applied (within the income band)	Levy contribution
$0-10,000	0%	0% of every dollar
$10,000-50,000	5%	5% of every dollar > $10K
$50,000-100,000	15%	$2,000 + 15% of every dollar > $50K
$100,000-200,000	25%	$9,500 + 25% of every dollar > $100K
$200,000-400,000	35%	$34,500 + 35% of every dollar > $200K
$400,000+	45%	$104,500 + 45% of every dollar > $400K

Appendix 1

Example applications of levy

Example application of various amounts

1. To illustrate the application of the levy, the following are examples of the levy contribution with various amounts of net property income –

   (a) net property income of $20K would contribute $500
   (b) net property income of $40K would contribute $1,500
   (c) net property income of $67K would contribute $4,550
   (d) net property income of $170K would contribute $27,000
   (e) net property income of $285K would contribute $64,250
   (f) net property income of $1,000K would contribute $374,500

Example of parish with funds earning interest

2. A parish may be setting aside funds over many years for the purpose of a new parish hall. In such a situation, there may be $500,000 in an account earning interest of 3% pa. For this parish, assuming no other income or associated costs, the net income is $15,000 pa. The contribution arising from that interest amount would be $250.

Examples of various sources of property income

3. A parish may have investment income of $10,000. If the parish has no other property income, the parish will contribute $0 to Synod funds.

4. A parish may have investment income of $10,000, and a leased property with income of $23,000 and related expenses of $3,000. This parish has net property receipts of $30,000 from which $1,000 would be contributed to Synod funds via the PRL.

5. A parish may have property income from a leased residential property of $30,000 p.a., but may be providing a housing allowance to a staff member of 30,000 p.a. This parish will contribute $0 to Synod funds from the lease income.

Appendix 2

Large Receipts Policy of Standing Committee (currently in place)

Church Trust Property

1. Property is "church trust property" if it is subject to any trust for or for the use, benefit or purposes of the Anglican Church in the Diocese of Sydney or any parochial unit or diocesan organisation in the Diocese.

2. All church property in this Diocese has been donated to trustees, or has been acquired with money placed in the hands of trustees, for the purposes of parochial units or diocesan organisations or for specific or general purposes within the Diocese.

3. Church trusts are not private trusts for the benefit of individual beneficiaries but are charitable trusts under which the property (subject to the power to vary those trusts under section 32 of the *Anglican Church of Australia Trust Property Act 1917*) is devoted to designated purposes in perpetuity. It is not held on trust solely for a group of persons who may have the right to use it for the time being and the obligation to maintain it.

4. When an Ordinance is promoted to provide for the sale or lease of church trust property the Standing Committee represents the interest of the Diocese as a whole and has established these guidelines to assist promoters in an appropriate sharing with the Diocese.

Large Receipts

5. The Synod and the Standing Committee have recognised that many sale ordinances (and some leasing ordinances) may contain a "windfall" element.

6. Among several Synod and Standing Committee resolutions on this subject, 3 can be summarised as –
   (a) Where parishes have greatly enhanced receipts which are beyond their reasonable needs, then the surplus should be shared with the rest of the Diocese.
   (b) It is not in the interests of any parish to be in a position where free-will offerings of the people are not needed to maintain its work.
   (c) Parishes should review their resources and incomes to identify any which might be allocated to new housing areas.

7. A bill for an ordinance involves a "Large Receipt" if –
   (a) expected sale proceeds exceed $500,000; or
   (b) expected leasing or investment income exceeds $50,000 pa.

Sharing with the rest of the Diocese

8. The normal expectation for a large receipt is that 15% of the proceeds will be added to the capital of the Diocesan Endowment and benefit the Diocese generally by helping to increase distributions of income available to the Synod. Notwithstanding this, upon special application, 15% of the proceeds may be allocated to other Diocesan beneficiaries to further the Diocesan Mission.

9. A higher percentage may be appropriate if the large receipt exceeds $1 million.

10. In addition to any allocation under 10.11 or 10.12 the promoters of an ordinance may recommend specific allocations for parochial or extra-parochial purposes.

11. A bill for an ordinance meeting these guidelines would not normally be referred to an ordinance review panel.

12. The promoters of a bill involving a large receipt may give reasons why these guidelines should not be followed for their bill.

Relationship with proposed property levy

By resolution 52/15, the Synod requested the Standing Committee to adhere to these guidelines for large receipts until such time as a proposal for a levy as an alternative to a large property receipts policy is considered by Synod.

Appendix 3

Large Property Receipts Policy

The original form of the Large Property Receipts Policy considered by Synod in 2015, is shown below with amendments in marked form indicating proposed changes to the policy for adoption by the Standing Committee.

Large Property Receipts Policy

Church Trust Property

1. Property is "church trust property" if it is subject to any trust for the use, benefit or purposes of the Anglican Church in the Diocese of Sydney or any parochial unit or diocesan organisation in the Diocese.
2. All church trust property in this Diocese has been donated to trustees, or has been acquired with money placed in the hands of trustees, for the purposes of parochial units or diocesan organisations or for specific or general purposes within the Diocese.
3. Church trusts are not private trusts for the benefit of individual beneficiaries but are charitable trusts under which the property (subject to the power to vary those trusts under section 32 of the Anglican Church of Australia Trust Property Act 1917) is devoted to designated purposes in perpetuity. It is not held on trust solely for a group of persons who may have the right to use it for the time being and the obligation to maintain it.

Rationale for this policy

4. The Standing Committee ~~Synod~~ considers that it is the responsibility of each parish to ensure, as far as possible, that its reasonable property needs for effectively undertaking ministry are met.
5. The Standing Committee ~~Synod~~ recognises that in order to meet a parish's reasonable property needs it is sometimes necessary or desirable to sell ~~or lease~~ church trust property held for the parish.
6. The Standing Committee ~~Synod~~ also recognises that sometimes the sale ~~and leasing~~ of parish property will give rise to a large property receipt which is beyond the reasonable property needs of the parish.
7. In these circumstances, the Standing Committee ~~Synod~~ considers that a portion of the large property receipt in excess of the reasonable property needs of the parish should be shared with the rest of the Diocese.

When does this policy apply?

~~8.~~ This policy will only apply if there is a large property receipt. For the purposes of this policy, a large property receipt will arise if –

~~(a)~~ the net sale proceeds of parish property is expected to exceed $1,000,000~~, or~~

~~(b) the net leasing income from parish property is expected to exceed $100,000 pa~~.

What are the reasonable property needs of a parish?

9. The reasonable property needs of a parish means that combination of land, buildings and associated infrastructure (and the means to maintain, renovate or replace such property) as is reasonably required by the parish to effectively undertake its ministry both currently and into the foreseeable future.
10. The Standing Committee will be guided by the parish in identifying its reasonable property needs.

Promotion of bills which give rise to a large property receipt

11. The statement of evidence accompanying a bill for the sale ~~or lease~~ of parish property which gives rise to a large property receipt should identify the reasonable property needs of the parish. If those reasonable property needs are currently not met –
    (a) the statement of evidence should also include a plan to ensure the parish meets those needs, and

(b) the bill should provide, as a first priority, for the application of the large property receipt in or toward meeting those needs in accordance with that plan and in conformity with any policy of the Standing Committee concerning the application of sale proceeds~~ and property income~~.

12. If a bill for a sale ~~or lease ~~of parish property gives rise to a large property receipt and –

(a) the reasonable property needs identified by the parish are less than the amount of the large property receipt, or

(b) the parish does not adequately identify or plan to meet its reasonable property needs,

the amount necessary to meet the reasonable property needs of the parish is, for the purposes of this policy, taken to be $1,000,000~~ in the case of a bill to sell parish property and $100,000 pa in the case of a bill to lease parish property~~.

Sharing with the rest of the Diocese

13. The Standing Committee's ~~Synod's~~ normal expectation for a large property receipt arising from a bill for an ordinance to sell parish property is that the parish should share 15% of any amount in excess of its reasonable property needs with the Mission Property Committee as an addition to the Mission Property Fund. If the excess is expected to be greater than $500,000, the percentage shared should be higher than 15%.

14. Any preference that the parish wishes to express concerning the application of a large property receipts payment to a particular Mission Property Committee project should be expressed in the Statement of Evidence which accompanies the bill rather than in the bill itself.

~~15. The Synod's normal expectation for a large property receipt arising from a bill for an ordinance to lease parish property is that the parish should share 30% of any amount in excess of its reasonable property needs with the Synod for allocation as part of its annual budgeting process or, upon special application, with other Diocesan beneficiaries. If the excess is expected to be greater than $50,000 pa, the percentage shared should be higher than 30%.~~

Review of bills for large property receipts ordinances

~~16.~~15. A bill for an ordinance which gives rise to a large property receipt but is promoted on the basis that the reasonable property needs identified by the parish are less than the amount of the large property receipt (under paragraph 12(a) above) will not usually be referred to an Ordinance Review Panel provided the bill makes provision for the sharing of a portion of the large property receipt in accordance with the normal expectations of the Standing Committee ~~Synod~~ under this policy.

Grant of relief from policy

~~17.~~16. The Standing Committee will consider any request for relief (in part or whole) from the sharing of a portion of a large property receipt in accordance with the normal expectation ~~of the Synod~~ under this policy. Such relief will not be granted unless the promoters of a bill involving a large property receipt give sufficient reasons for an exception.

Reports concerning amounts shared under the policy

~~18.~~17. A report will be provided to the Synod each year identifying all amounts shared under this policy with the Mission Property Fund and other diocesan beneficiaries in the preceding year~~ and with the Synod for allocation as part of its budget in the following year~~.

Amendment of the policy

~~19.~~18. The Standing Committee may make amendments to this policy provided such amendments are reported to the next ordinary session of the Synod.

~~Sunset~~

~~20. This policy ceases to operate on the first day of the ordinary session of the Synod in 2020.~~

Appendix 4

Modelling of levy contributions

It is anticipated that Synod may desire to test the application of the levy against gross property income, or in an expanded form of net income that allows expenditure on ministry property to be offset. Accordingly, to outline the possibilities and demonstrate the likely required contribution bands under different models, below are three different models of levy application as well as indicative contribution amounts from each parish under each model.

This modelling uses data directly from the 2015 parish returns (the latest complete data available) and accordingly only takes into account income that has been distributed to a parish. Please note that these models can only be viewed as indicative, as the presence of the levy will likely change spending behaviour.

Model 1: Levy on gross property income

	Contribution bands					**Total**
From	$10,000	$50,000	$100,000	$200,000	$400,000	
to	$50,000	$100,000	$200,000	$400,000		
% levy	5%	10%	20%	30%	40%	
Total	$262,478	$298,082	$499,451	$762,053	$629,739	**$2,451,802**
	115	38	26	6	10	**195**
	(No. of parishes with total property income in this range)					

Model 2: Levy on net property income (recommended)

	Contribution bands					**Total**
From	$10,000	$50,000	$100,000	$200,000	$400,000	
to	$50,000	$100,000	$200,000	$400,000		
% levy	5%	15%	25%	35%	45%	
Total	$250,429	$401,430	$582,234	$702,013	$624,419	**$2,560,525**
	118	40	19	9	7	**193**
	(No. of parishes with total property income in this range)					

Model 3: Levy on net property income (with deduction for ministry property expenses)

	Contribution bands			**Total**
From	$0	$50,000	$100,000	
to	$50,000	$100,000		
% levy	15%	30%	50%	
Total	$470,551	$380,437	$1,515,971	**$2,366,958**
	73	17	18	**108**
(No. of parishes with total property income in this range)				

Indicative contribution amounts from each parish, under each model

Note: These <u>indicative</u> contribution amounts are based on 2015 data provided by each parish in their Prescribed Financial Statements and on the contribution percentages detailed in Appendix 4.

Parish	Property Income (P.I.)	1. Levy on gross P.I.		2. Levy on net P.I.		3. Levy on P.I. net of all property expenses	
Abbotsford	$62K	$3K	5%	$4K	6%	$7K	12%
Albion Park	$17K	$0K	2%	$0K	2%	$0K	0%
Annandale	$86K	$6K	7%	$7K	9%	$14K	17%
Arncliffe	$38K	$1K	4%	$1K	4%	$4K	10%
Artarmon	$19K	$0K	2%	$0K	2%	$0K	0%
Ashbury	$25K	$1K	3%	$1K	3%	$0K	0%
Ashfield, Five Dock and Haberfield	$424K	$97K	23%	$114K	27%	$67K	16%
Asquith / Mt Colah / Mt Kuring-gai	$19K	$0K	2%	$0K	2%	$0K	0%
Auburn - St Philip	$40K	$2K	4%	$1K	2%	$2K	6%
Auburn - St Thomas	$3K	$0K	0%	$0K	0%	$0K	0%
Austinmer	$8K	$0K	0%	$0K	0%	$0K	0%
Balgowlah	$87K	$6K	7%	$6K	7%	$7K	8%
Balmain	$39K	$1K	4%	$1K	4%	$0K	0%
Bankstown	$24K	$1K	3%	$1K	3%	$3K	13%
Barrenjoey	$67K	$4K	6%	$3K	4%	$5K	8%
Baulkham Hills	$33K	$1K	3%	$1K	3%	$2K	7%
Beacon Hill	$24K	$1K	3%	$1K	3%	$3K	11%
Beecroft	$62K	$3K	5%	$2K	4%	$0K	0%
Bellevue Hill	$152K	$17K	11%	$19K	12%	$14K	9%
Belmore w/ M. Hill & C. Park	$33K	$1K	3%	$1K	3%	$0K	0%
Belrose	$71K	$4K	6%	$5K	7%	$6K	8%
Berala	$1K	$0K	0%	$0K	0%	$0K	0%
Berowra	$4K	$0K	0%	$0K	0%	$0K	0%
Berry	$11K	$0K	1%	$0K	1%	$0K	0%
Beverly Hills with Kingsgrove	$40K	$1K	4%	$1K	4%	$0K	0%
Blackheath	$12K	$0K	1%	$0K	1%	$0K	0%
Blacktown	$136K	$14K	10%	$19K	14%	$10K	7%
Blakehurst	$13K	$0K	1%	$0K	0%	$0K	0%
Bomaderry	$10K	$0K	0%	$0K	0%	$0K	0%
Bondi	$159K	$19K	12%	$24K	15%	$2K	1%
Bowral	$26K	$1K	3%	$1K	3%	$0K	0%
Brighton/Rockdale	$105K	$8K	8%	$8K	8%	$5K	5%
Broadway	$524K	$137K	26%	$35K	7%	$2K	0%
Bulli	$31K	$1K	3%	$1K	3%	$0K	0%
Burwood	$103K	$8K	7%	$9K	9%	$3K	3%
Cabramatta	$11K	$0K	0%	$0K	0%	$0K	0%
Cambridge Park	$1K	$0K	0%	$0K	0%	$0K	0%
Camden	$90K	$6K	7%	$5K	5%	$0K	0%
Campbelltown	$154K	$18K	12%	$23K	15%	$15K	10%
Campsie	$33K	$1K	4%	$1K	4%	$0K	1%

Parish	Property Income (P.I.)	1. Levy on gross P.I.		2. Levy on net P.I.		3. Levy on P.I. net of all property expenses	
Canterbury with Hurlstone Park	$26K	$1K	3%	$1K	3%	$0K	0%
Caringbah	$28K	$1K	3%	$1K	3%	$0K	0%
Carlingford and North Rocks	$4K	$0K	0%	$0K	0%	$1K	15%
Castle Hill	$16K	$0K	2%	$0K	2%	$0K	0%
Centennial Park	$18K	$0K	2%	$0K	2%	$0K	0%
Chatswood	$11K	$0K	0%	$0K	0%	$0K	0%
Cherrybrook	$0K	$0K	0%	$0K	0%	$0K	0%
Chester Hill with Sefton	$1K	$0K	0%	$0K	0%	$0K	0%
Christ Church Northern Beaches	$68K	$4K	6%	$4K	6%	$0K	0%
Church Hill	$420K	$95K	23%	$114K	27%	$143K	34%
Clovelly	$83K	$5K	6%	$2K	2%	$5K	6%
Cobbitty	$30K	$1K	3%	$1K	3%	$0K	0%
Concord and Burwood	$45K	$2K	4%	$2K	4%	$5K	11%
Concord North	$8K	$0K	0%	$0K	0%	$0K	0%
Concord West w/ Concord Nth	$52K	$2K	4%	$2K	4%	$0K	0%
Coogee	$55K	$3K	5%	$3K	5%	$7K	12%
Cooks River	$17K	$0K	2%	$0K	2%	$0K	0%
Corrimal	$41K	$2K	4%	$1K	3%	$3K	7%
Cranebrook with Castlereagh	$25K	$1K	3%	$1K	3%	$0K	0%
Cremorne	$162K	$19K	12%	$23K	14%	$25K	15%
Cronulla	$37K	$1K	4%	$1K	4%	$2K	6%
Croydon	$33K	$1K	3%	$1K	3%	$0K	0%
Culburra Beach	$3K	$0K	0%	$0K	0%	$0K	0%
Dapto	$51K	$2K	4%	$2K	4%	$0K	0%
Darling Point	$334K	$67K	20%	$71K	21%	$103K	31%
Darling Street	$328K	$65K	20%	$37K	11%	$0K	0%
Darlinghurst	$401K	$88K	22%	$79K	20%	$117K	29%
Dee Why	$14K	$0K	1%	$0K	1%	$0K	0%
Denham Court	$12K	$0K	1%	$0K	1%	$1K	9%
Doonside	$0K	$0K	0%	$0K	0%	$0K	0%
Drummoyne	$30K	$1K	3%	$1K	3%	$0K	0%
Dulwich Hill	$68K	$4K	6%	$4K	6%	$7K	11%
Dundas/Telopea	$86K	$6K	7%	$7K	9%	$0K	0%
Dural District	$7K	$0K	0%	$0K	0%	$0K	0%
Eagle Vale	$8K	$0K	0%	$0K	0%	$0K	0%
Earlwood	$30K	$1K	3%	$1K	3%	$0K	0%
East Lindfield	$44K	$2K	4%	$2K	4%	$0K	0%
Eastgardens	$22K	$1K	3%	$1K	3%	$2K	8%
Eastwood	$29K	$1K	3%	$1K	2%	$0K	0%
Emu Plains	$1K	$0K	0%	$0K	0%	$0K	0%
Enfield and Strathfield	$49K	$2K	4%	$2K	4%	$0K	0%
Engadine	$2K	$0K	0%	$0K	0%	$0K	0%
Enmore/Stanmore	$20K	$0K	2%	$0K	2%	$0K	0%
Epping	$107K	$8K	8%	$11K	10%	$12K	11%

Parish	Property Income (P.I.)	1. Levy on gross P.I.		2. Levy on net P.I.		3. Levy on P.I. net of all property expenses	
Ermington	$6K	$0K	0%	$0K	0%	$0K	0%
Fairfield with Bossley Park	$39K	$1K	4%	$1K	3%	$0K	0%
Fairy Meadow	$16K	$0K	2%	$0K	2%	$0K	0%
Figtree	$5K	$0K	0%	$0K	0%	$0K	0%
Forestville	$34K	$1K	4%	$1K	4%	$0K	0%
Frenchs Forest	$5K	$0K	0%	$0K	0%	$0K	0%
Freshwater	$19K	$0K	2%	$0K	2%	$0K	0%
Georges Hall	$1K	$0K	0%	$0K	0%	$0K	0%
Gerringong	$3K	$0K	0%	$0K	0%	$0K	0%
Gladesville	$239K	$39K	16%	$37K	16%	$43K	18%
Glebe	$111K	$9K	8%	$9K	8%	$10K	9%
Glenhaven	$3K	$0K	0%	$0K	0%	$0K	0%
Glenmore Park	$1K	$0K	0%	$0K	0%	$0K	0%
Glenquarie	$46K	$2K	4%	$1K	3%	$3K	6%
Gordon	$35K	$1K	4%	$1K	4%	$0K	0%
Granville	$10K	$0K	0%	$0K	0%	$0K	0%
Greenacre	$53K	$2K	4%	$0K	1%	$1K	2%
Greenwich	$139K	$15K	11%	$19K	14%	$29K	21%
Greystanes - Merrylands West	$20K	$1K	3%	$0K	0%	$0K	0%
Guildford with Villawood	$70K	$4K	6%	$1K	2%	$0K	0%
Gymea	$18K	$0K	2%	$0K	2%	$0K	0%
Harbour Church	$0K	$0K	0%	$0K	0%	$0K	15%
Helensburgh and Stanwell Park	$26K	$1K	3%	$1K	2%	$0K	0%
Hornsby	$31K	$1K	3%	$1K	3%	$0K	0%
Hornsby Anglican Chinese Church	$5K	$0K	0%	$0K	0%	$1K	15%
Hornsby Heights	$6K	$0K	0%	$0K	0%	$0K	0%
Hoxton Park	$35K	$1K	4%	$1K	4%	$0K	0%
Hunters Hill	$87K	$6K	7%	$8K	9%	$0K	0%
Hurstville	$2K	$0K	0%	$0K	0%	$0K	0%
Hurstville Grove	$3K	$0K	0%	$0K	0%	$0K	0%
Huskisson	$4K	$0K	0%	$0K	0%	$0K	0%
Ingleburn	$0K	$0K	0%	$0K	0%	$0K	0%
Jamberoo	$30K	$1K	3%	$1K	3%	$2K	5%
Jannali	$2K	$0K	0%	$0K	0%	$0K	0%
Kangaroo Valley	$24K	$1K	3%	$0K	1%	$1K	5%
Katoomba	$36K	$1K	4%	$1K	4%	$4K	11%
Keiraville	$3K	$0K	0%	$0K	0%	$0K	0%
Kellyville	$32K	$1K	3%	$1K	3%	$0K	0%
Kensington Eastlakes	$83K	$5K	6%	$7K	8%	$5K	6%
Kiama	$34K	$1K	4%	$1K	4%	$0K	0%
Killara	$38K	$1K	4%	$1K	4%	$0K	0%
Kingsford	$45K	$2K	4%	$2K	4%	$3K	7%
Kingswood	$26K	$1K	3%	$1K	3%	$0K	0%
Kirribilli	$16K	$0K	2%	$0K	2%	$0K	0%

Parish	Property Income (P.I.)	1. Levy on gross P.I.		2. Levy on net P.I.		3. Levy on P.I. net of all property expenses	
Kurrajong	$24K	$1K	3%	$1K	3%	$0K	0%
Lakemba	$38K	$1K	4%	$1K	4%	$3K	8%
Lalor Park and Kings Langley	$40K	$2K	4%	$2K	4%	$4K	9%
Lane Cove and Mowbray	$142K	$15K	11%	$19K	14%	$21K	15%
Lavender Bay	$87K	$6K	7%	$4K	5%	$0K	0%
Lawson	$3K	$0K	0%	$0K	0%	$0K	0%
Leichhardt	$253K	$43K	17%	$45K	18%	$67K	26%
Leura	$25K	$1K	3%	$1K	3%	$0K	0%
Lidcombe	$12K	$0K	1%	$0K	1%	$0K	0%
Lindfield	$28K	$1K	3%	$1K	3%	$0K	0%
Lithgow	$32K	$1K	3%	$1K	2%	$0K	0%
Liverpool	$110K	$9K	8%	$12K	11%	$8K	7%
Liverpool South	$5K	$0K	0%	$0K	0%	$0K	0%
Longueville	$91K	$6K	7%	$8K	9%	$20K	22%
Lord Howe Island	$1K	$0K	0%	$0K	0%	$0K	0%
Lower Mountains	$2K	$0K	0%	$0K	0%	$0K	0%
Lugarno	$3K	$0K	0%	$0K	0%	$0K	0%
Macquarie	$64K	$3K	5%	$4K	6%	$12K	18%
Malabar	$108K	$9K	8%	$9K	9%	$16K	15%
Manly	$411K	$91K	22%	$97K	24%	$113K	28%
Maroubra	$18K	$0K	2%	$0K	2%	$0K	0%
Marrickville	$179K	$23K	13%	$25K	14%	$23K	13%
Menai	$5K	$0K	0%	$0K	0%	$0K	0%
Menangle	$0K	$0K	0%	$0K	0%	$0K	0%
Merrylands	$87K	$6K	7%	$8K	9%	$10K	12%
Minchinbury	$10K	$0K	0%	$0K	0%	$0K	0%
Minto	$2K	$0K	0%	$0K	0%	$0K	0%
Miranda	$101K	$7K	7%	$7K	7%	$1K	1%
Mittagong	$2K	$0K	0%	$0K	0%	$0K	0%
Mona Vale	$20K	$0K	2%	$0K	2%	$2K	10%
Moorebank	$17K	$0K	2%	$0K	2%	$0K	0%
Mosman - St Clement	$149K	$17K	11%	$22K	15%	$6K	4%
Mosman - St Luke	$151K	$17K	11%	$9K	6%	$0K	0%
Moss Vale	$19K	$0K	2%	$0K	2%	$0K	0%
Mt Druitt	$33K	$1K	3%	$1K	3%	$3K	10%
Mulgoa	$36K	$1K	4%	$1K	3%	$4K	11%
Narellan	$16K	$0K	2%	$0K	2%	$0K	0%
Naremburn/Cammeray	$3K	$0K	0%	$0K	0%	$0K	0%
Narrabeen	$38K	$1K	4%	$1K	4%	$0K	0%
Neutral Bay	$164K	$20K	12%	$26K	16%	$18K	11%
Newport	$22K	$1K	3%	$1K	3%	$0K	0%
Newtown with Erskineville	$128K	$13K	10%	$17K	13%	$15K	12%
Norfolk Island	$0K	$0K		$0K		$0K	
Normanhurst	$113K	$10K	8%	$13K	11%	$1K	1%

Parish	Property Income (P.I.)	1. Levy on gross P.I.		2. Levy on net P.I.		3. Levy on P.I. net of all property expenses	
North Epping	$17K	$0K	2%	$0K	2%	$0K	0%
North Ryde	$39K	$1K	4%	$0K	1%	$2K	6%
North Sydney	$604K	$168K	28%	$184K	30%	$137K	23%
Northbridge	$75K	$5K	6%	$6K	8%	$0K	0%
Northmead and Winston Hills	$19K	$0K	2%	$0K	2%	$0K	0%
Norwest	$19K	$0K	2%	$0K	2%	$0K	0%
Nowra	$28K	$1K	3%	$1K	3%	$0K	0%
Oak Flats	$0K	$0K	0%	$0K	0%	$0K	0%
Oakhurst	$76K	$5K	6%	$6K	8%	$2K	2%
Oatley	$43K	$2K	4%	$2K	4%	$0K	0%
Oatley West	$0K	$0K	0%	$0K	0%	$0K	0%
Oran Park	$1K	$0K	0%	$0K	0%	$0K	0%
Paddington	$105K	$8K	8%	$10K	9%	$13K	12%
Padstow	$1K	$0K	0%	$0K	0%	$0K	0%
Panania	$2K	$0K	0%	$0K	0%	$0K	0%
Parramatta	$761K	$231K	30%	$265K	35%	$284K	37%
Parramatta North w/ Harris Park	$106K	$8K	8%	$11K	10%	$7K	6%
Peakhurst/Mortdale	$10K	$0K	0%	$0K	0%	$0K	0%
Penrith	$139K	$15K	11%	$1K	1%	$0K	0%
Penshurst	$42K	$2K	4%	$1K	2%	$3K	6%
Petersham	$22K	$1K	3%	$1K	3%	$0K	0%
Philadelphia Anglican Church	$2K	$0K	0%	$0K	0%	$0K	15%
Picton	$1K	$0K	0%	$0K	0%	$0K	0%
Pitt Town	$27K	$1K	3%	$0K	2%	$0K	0%
Port Kembla	$89K	$6K	7%	$5K	6%	$11K	13%
Putney	$0K	$0K		$0K		$0K	
Pymble	$29K	$1K	3%	$1K	3%	$0K	0%
Quakers Hill	$0K	$0K		$0K		$0K	
Randwick	$494K	$125K	25%	$138K	28%	$90K	18%
Regents Park	$0K	$0K	0%	$0K	0%	$0K	0%
Revesby	$0K	$0K	0%	$0K	0%	$0K	0%
Richmond	$20K	$1K	3%	$0K	1%	$1K	3%
Riverstone	$25K	$1K	3%	$1K	3%	$2K	10%
Riverwood - Punchbowl	$41K	$2K	4%	$2K	4%	$0K	0%
Robertson	$0K	$0K	0%	$0K	0%	$0K	0%
Rooty Hill	$8K	$0K	0%	$0K	0%	$0K	0%
Rosemeadow	$70K	$4K	6%	$5K	7%	$6K	8%
Roseville	$19K	$0K	2%	$0K	2%	$0K	0%
Roseville East	$30K	$1K	3%	$1K	3%	$2K	6%
Rouse Hill	$13K	$0K	1%	$0K	1%	$0K	0%
Ryde	$672K	$196K	29%	$227K	34%	$224K	33%
Sadleir	$53K	$2K	4%	$3K	5%	$5K	9%
Sans Souci	$36K	$1K	4%	$1K	4%	$1K	3%
Seaforth	$30K	$1K	3%	$1K	3%	$0K	0%

Parish	Property Income (P.I.)	1. Levy on gross P.I.		2. Levy on net P.I.		3. Levy on P.I. net of all property expenses	
Seven Hills	$4K	$0K	0%	$0K	0%	$0K	0%
Shellharbour	$8K	$0K	0%	$0K	0%	$0K	0%
Shellharbour City Centre	$26K	$1K	3%	$1K	3%	$0K	0%
Shoalhaven Heads	$0K	$0K	0%	$0K	0%	$0K	0%
Smithfield Road	$59K	$3K	5%	$3K	6%	$6K	10%
Soul Revival Church, S. Shire	$0K	$0K		$0K		$0K	
South Carlton	$4K	$0K	0%	$0K	0%	$0K	0%
South Coogee	$20K	$1K	3%	$0K	0%	$0K	0%
South Creek	$35K	$1K	4%	$1K	4%	$0K	0%
South Hurstville	$42K	$2K	4%	$2K	4%	$0K	0%
South Sydney	$87K	$6K	7%	$5K	6%	$4K	5%
Springwood	$14K	$0K	1%	$0K	1%	$0K	0%
St Clair	$1K	$0K	0%	$0K	0%	$0K	0%
St George	$46K	$2K	4%	$2K	3%	$1K	2%
St George North	$29K	$1K	3%	$1K	3%	$0K	0%
St Ives	$2K	$0K	0%	$0K	0%	$0K	0%
St Marys	$7K	$0K	0%	$0K	0%	$0K	0%
Strathfield and Homebush	$53K	$2K	4%	$2K	5%	$1K	2%
Summer Hill	$64K	$3K	5%	$4K	6%	$7K	11%
Surry Hills	$260K	$45K	17%	$50K	19%	$28K	11%
Sussex Inlet	$0K	$0K	0%	$0K	0%	$0K	0%
Sutherland	$44K	$2K	4%	$1K	2%	$3K	7%
Sutton Forest	$40K	$2K	4%	$2K	4%	$0K	0%
Sydney-Cathedral of St Andrew	$0K	$0K		$0K		$0K	
Sydney-Christ Church St Laurence	$326K	$65K	20%	$71K	22%	$70K	22%
Sydney-St James King Street	$864K	$272K	32%	$313K	36%	$325K	38%
Sylvania	$79K	$5K	6%	$6K	8%	$7K	9%
The Oaks	$12K	$0K	1%	$0K	1%	$0K	0%
Thornleigh - Pennant Hills	$6K	$0K	0%	$0K	0%	$0K	0%
Toongabbie	$5K	$0K	0%	$0K	0%	$0K	0%
Turramurra	$78K	$5K	6%	$6K	8%	$0K	0%
Turramurra South	$3K	$0K	0%	$0K	0%	$0K	0%
Ulladulla	$23K	$1K	3%	$0K	2%	$0K	0%
Unichurch (UNSW)	$0K	$0K		$0K		$0K	
Vaucluse and Rose Bay	$103K	$8K	7%	$10K	10%	$3K	3%
Wahroonga - St Andrew	$10K	$0K	0%	$0K	0%	$0K	0%
Wahroonga - St Paul	$76K	$5K	6%	$6K	8%	$5K	7%
Waitara	$34K	$1K	4%	$1K	4%	$0K	0%
Watsons Bay	$55K	$2K	5%	$3K	5%	$0K	0%
Waverley	$172K	$21K	12%	$28K	16%	$32K	19%
Wentworth Falls	$15K	$0K	2%	$0K	2%	$0K	1%
Wentworthville	$1K	$0K	0%	$0K	0%	$0K	0%
West Lindfield	$32K	$1K	3%	$1K	3%	$1K	3%
West Pennant Hills	$8K	$0K	0%	$0K	0%	$0K	0%

Parish	Property Income (P.I.)	1. Levy on gross P.I.		2. Levy on net P.I.		3. Levy on P.I. net of all property expenses	
West Pymble	$5K	$0K	0%	$0K	0%	$0K	0%
West Ryde	$35K	$1K	4%	$1K	4%	$0K	0%
West Wollongong	$93K	$6K	7%	$7K	7%	$0K	0%
Westmead	$36K	$1K	4%	$1K	4%	$1K	2%
Wilberforce	$28K	$1K	3%	$1K	3%	$1K	2%
Willoughby	$21K	$1K	3%	$1K	3%	$0K	0%
Willoughby Park	$67K	$4K	5%	$4K	7%	$5K	8%
Windsor	$48K	$2K	4%	$1K	3%	$3K	7%
Wollondilly	$6K	$0K	0%	$0K	0%	$0K	0%
Wollongong	$198K	$27K	13%	$34K	17%	$21K	10%
Woollahra	$31K	$1K	3%	$1K	3%	$2K	7%
Yagoona	$98K	$7K	7%	$5K	5%	$0K	0%

Attachment 2

Property Receipt Levy – Discussion Paper

Calculated of the Property Receipts Levy based on gross vs net property income

Introduction

1. This discussion paper is intended to accompany the report 'Property Receipts Levy – form of calculation and mechanism for debate at Synod' in order to inform a suggested Synod debate on the question of whether the Property Receipts Levy (PRL) should be applied based on gross property income (Gross) or net property income (Net).

2. In either case the proposed levy (either based on Gross or Net) will allow offsets for –

(a) lease payments for a place of public worship (for example, if a parish uses property income to finance the rent it pays for a leased church meeting place), and

(b) mortgage repayments, lease payments or housing allowances for a residence for ministry staff where there is a corresponding residential property owned by the parish that is generating lease income (for example, where a ministry residence owned by a parish is unsuitable for its purpose and is rented out in order to fund the leasing of another residence for a minister).

3. The following paragraphs present the case for Net, and then the case for Gross.

4. The arguments for Net are based on paragraphs 9(c), (d) & (e) of the Explanatory Report for the Net Bill. The arguments for Gross are drawn from paragraphs 12-19 & 34 of the Explanatory Report for the Gross Bill, but in some parts they are a summary and in other parts a copy of those paragraphs.

Arguments for a levy based on Net property income

5. A levy could be applied either to the gross property income of a parish, or to a parish's property income net of related expenses. Applying the levy to the gross amount would have the advantages of being simpler to administer and easier to forecast the amount of funds raised by the levy. However, given that the theological foundation of the levy is found in "sharing out of surplus", the form of proposed levy recommended by the committee applies to property income **net** of property expenses related to that income-producing property.

6. Applying the levy to net property income rather than gross property income also ensures that parishes with income-producing properties that are more expensive to maintain are not unduly levied. For example, consider two parishes, each with a property generating income of $100,000 p.a. One parish may have related property expenses (including mortgage repayments) of $80,000 p.a. which means that the net income to the parish is only $20,000 p.a. The other parish has relatively few expenses (say $10,000 p.a.), and receives a net income of $90,000 p.a. If the levy were applied against gross income, both parishes would be expected to contribute the same amount, with the first parish drawing from net income of only $20,000 while the second can draw from net income of $90,000. However, if applied against net income, each parish would contribute in proportion to their net income received, and thereby satisfy the principles of "equality" and "equity".

7. Applying the levy to net property income rather than the gross property income encourages parishes to be good stewards of their income-producing properties, because parishes which use property income for the maintenance and improvement of income-producing properties will pay a lower levy. A levy on gross property income may encourage some parishes to defer necessary property maintenance, especially where the property costs are similar to the income received. For example, where property income = $100,000 and property expenses = $100,000, levy on gross income = $5,000, which means the parish has to find $5,000 from other sources (i.e., offertory) to pay the levy.

8. The principle argument against a levy on net income is that keeping track of deductable property expenses will increase compliance costs for parishes and SDS. However, these costs are in direct proportion to the complexity of a parish's income-producing properties. A parish with modest property income from (say) occasional hall rental and few deductions will have little difficulty in completing the worksheet. Parishes in this situation also have the option of not completing parts of the worksheet where they conclude that the additional compliance costs are greater than the value of the deduction. However, for other parishes, the value of the deduction will justify the extra paperwork. For example, where a parish is using $100,000 income from a property to repay a $1,000,000 mortgage on that property, they would receive a 100% deduction for those repayments, and not be subject to a levy. Parishes with large mortgages

or with large and complex income-producing property portfolios tend to be parishes that the capacity to track and provide the necessary information required to calculate the PRL deduction.

Arguments for a levy based on Gross property income

The principle of "sharing out of surplus" does not help decide the matter

9. The 2017 Report received with resolution 34/17 argued that, as the foundation of the levy is found in "sharing out of surplus", the levy should be based on net property income. To illustrate its point the 2017 Report compared two parishes with the same level of lease income, one with significant expenses related to the leased property and the other with only minimal expenses relating to the leased property.

10. The problem with this argument is that the same principle of "sharing out of surplus" can equally be applied to provide the foundation for a levy based on gross property income.

11. Consider the situation of two parishes with identical property (say 1 church, 2 halls and 2 rectories) but one parish receives lease income from one of its halls and a rectory whereas the other parish uses all of its 5 properties for ministry and so has no lease income. Both parishes face the same costs to maintain their properties, but the first parish is clearly in a more favourable financial position because it has a source of income derived from the generosity of previous generations and the advantages of geography.

The calculation of 'net' is complex and costly (both for parishes and SDS)

12. The calculation of a parish's property income on a basis consistent with resolution 34/17 is quite complex. The two changes agreed by Standing Committee (to remove the deductions for the property insurance component of the PCR charge, and bank and financial statutory charges, taxes and assessments) only reduce some of that complexity. For quite a number of parishes this complexity would require significant changes to their accounting practices to identify and isolate the amounts needed for the calculation of deductions. In addition to the need to create a number of new sub-accounts by type of expense, there would be a need to keep separate accounts for the income and expenses of each leased property and analyse some other non-expense type payments, such as loan repayments, by property.

13. That complexity would not only add to the workload (and cost) for parishes to change accounting systems, record and analyse transactions in more detail, and compile the required Property Income Worksheet and arrange for it to be audited; it would also make the resultant calculation significantly less transparent. Furthermore, it is likely that SDS will incur additional staff time to advise on, administer and ensure compliance with the complexities of such a Property income Worksheet.

The calculation of 'gross' is much simpler, more transparent, less susceptible to manipulation

14. The alternative proposed in basing the levy on gross property income greatly simplifies the calculation of a parish's property income by removing the need to identify income and expense/deductions by individual property. A levy based on gross property income therefore reduces the administrative burden (and cost) on parishes (and SDS) and results in a much more transparent calculation, while still giving effect to the foundation for the levy, ie. a sharing out of surplus.

15. Appendix 4 to the 2017 Report contained a table headed 'Model 1: Levy based on gross property income' which suggested various (reduced) rates of levy applicable to gross property income using the same contribution bands as were proposed for the levy based on net property income. Appendix 4 then went on to list the indicative contribution for each parish using either gross or net property income.

The use of 'gross' allows for a higher threshold and a lower rate of levy

16. The Bill to enable a PRL based on gross property income uses a simplified form of the table in Model 1 from the 2017 Report. Since gross property income will always be equal to or higher than net property income, the table below compares the rate of levy using gross and net property income. Using gross property income allows for a higher threshold ($50,000 compared with $10,000) before any levy is payable and then a lower rate of levy for each contribution band beyond the first $50,000. For most parishes there will be very little difference between the actual amount of levy payable whether the levy is based on gross or net property income.

The use of 'gross' allows the levy to commence 1 year earlier

17. A calculation based on gross property income allows the levy to commence when envisaged in the timetable included in the 2017 report because the all the data is available now from the existing Prescribed Financial Statements. (A levy based on net property income will have to be delayed 12 months in order to provide for the collection of the data required as a result of the delay caused by the referral of the ordinance to Synod.)