

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.

| | | | |
|-----------------------|--------------------------------|--|-------------------------------|
| | <u>Hall</u> | | <u>Residence</u> |
| 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 deductible 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 priority 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 deductible 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 |

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.

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.

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

- ~~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

- ~~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

- ~~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

- ~~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.~~

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 |
| | <i>(No. of parishes with total property income in this range)</i> | | | | | |

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 |
| | <i>(No. of parishes with total property income in this range)</i> | | | | | |

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 |
| | <i>(No. of parishes with total property income in this range)</i> | | | |

Indicative contribution amounts from each parish, under each model

Note: These indicative 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/Stammore | \$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% |
| Gerrington | \$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% |
| Turrumurra | \$78K | \$5K | 6% | \$6K | 8% | \$0K | 0% |
| Turrumurra 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% |

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|-----------------|------------------------|-----------------------|-----|---------------------|-----|--|-----|
| | | | | | | | |
| 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% |