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# Tiebout Visits Germany: Land Tax Capitalisation in a Sample of German Municipalities

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TIEBOUT VISITS GERMANY: LAND TAX CAPITALIZATION IN A SAMPLE OF GERMAN MUNICIPALITIES

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Abstract:

The paper explores the determinants of land value and rent level in a large cross-section of

German municipalities, controlling for several amenities, disamenities, the local structure of

land, and for economic and fiscal conditions. The effective land tax rate is measured from the

statutory tax rate and a location-specific indicator of the assessment rate. Using an instrumen-

tal variable (GMM) approach the results show that in accordance with the theory land taxes

do capitalize into land values, whereas the monthly rent level remains unaffected by the land

tax. In addition, the results point to significant spillovers from amenities and the provision of

public goods across municipalities.

**Keywords**: Land Taxation, Tax Capitalization, Fiscal Externalities

JEL Classification: H73, R21, C21

# 1 Introduction

Besides of grants and revenue sharing the main revenue source of German municipalities is a local business tax. This tax is critized not only by the businesses, but also by the municipalities. In fact, it shows several weaknesses, in particular, a small and instable tax base. However, the municipalities also have a land tax to their disposal, and a thorough overhaul of the land tax is occasionally discussed as one of the options to reform the finances of German municipalities (e.g., Zimmermann, 1999, Fuest and Thoene, 2002). In the light of the literature on local public finance a local land tax is quite appealing: if the supply of land is rather inelastic and if households are rather mobile the value of the land will reflect the supply of local public services. A huge empirical literature on the related property tax has by and large supported this view for the US (see Yinger et al., 1988, for an overview), and even though the efficiency of the property tax is a matter of debate, the main point critizised is not the taxation of real estate as such but the inclusion of improvements to the tax base (Zodrow, 2000).

As compared to the US property tax, surprisingly little is known about the German land tax. In particular, it is not known whether households are sufficiently mobile to generate capitalization effects. Also, it seems quite likely that institutions on the housing and real estate markets like rent controls and zoning object a larger role played by the land tax. Furthermore, there is, to the best of my knowledge, not a single empirical study of the capitalization of local fiscal policies in Germany. The lack of capitalization studies for Germany stands in marked contrast to the large number of important policy issues raised by the complex institutions of the finances of German municipalities.

Given this background, the current paper aims at an analysis of land tax capitalization in Germany. Although capitalization is a rather standard issue in the literature, to approach this topic in the German context is new ground for empirical research. Hence, we look in the paper not only on the impact of the land tax on land value but also undertake some control estimations for the monthly rent. The empirical analysis is based on a cross-section of about 675 municipalities in a major German state. Using an instrumental variable (GMM) approach the results show that land taxes do capitalize into land values, whereas the monthly rent level remains unaffected by the land tax. In addition, the results point to significant spillovers from amenities and the provision of public goods across municipalities.

The reminder of the paper is organized as follows. The next section lays out the investigation approach. Then, a description of the dataset is provided, followed by a short discussion of the empirical investigation approach and the presentation of the results. The last section provides the conclusions.

# 2 Investigation Approach

Although the current analysis deals with a land tax, the impact of tax incentives can formally be derived analogous to the case of the property tax (e.g., Brueckner, 1982) when abstracting from improvements. Consider a household which derives utility from local amenities g, which may include public services, from a unit lot size, and from the consumption of a numeraire x. The utility function is u = (g, x). In equilibrium, the household attains a utility level h(y) corresponding to the income level y. Hence, the following condition must hold at each location

$$h(y) = u(g, y - R),$$

where R is the rent level. This relationship defines the bid rent of the consumer

$$R = R(q, y).$$

The land value V is now determined by the present value of the excess of the bid-rent over the tax payments

$$V = \frac{R(g, y) - T}{r}.$$

The tax capitalization formula is obtained when inserting a definition of the land tax such as  $T = \tau V$ , where the tax base is the market value of land. Solving for V yields

$$V = \frac{R(g, y)}{r + \tau}.$$
 (1)

For the related case of a property tax, a large literature has dealt with the question of whether this strong theoretical result holds empirically (for a survey see Yinger et al., 1988). The estimation problem generally is to determine a relationship between the land value and local characteristics

$$V = V(g, y, \tau). \tag{2}$$

Given the above formula (1) the empirical estimate of the elasticity of the land value with respect to the tax rate  $(\hat{\gamma})$  should reflect the share of property tax payments in the annualized total cost of holding a piece of land (interest revenue obtained from an investment of the same size of the land value plus tax payments). Formally

$$\widehat{\gamma} = -\frac{\tau}{r + \tau}.\tag{3}$$

Even though most empirical studies point to a significant degree of tax capitalization they often fail to find support for full capitalization. However, there is a host of substantial measurement and estimation problems involved. One of the problems faced by empirical research is to properly take into account the specifics of each individual piece of property. Therefore, empirical

research has often focused on micro data, which report the characteristics as for instance the size and the age of buildings as well as property tax payments. As the current analysis deals with a land tax, heterogeneity is probably less of problem, in particular, since the statutory tax rate is known.

Another problem encountered in empirical research is to properly determine the tax rate on the property value. In fact, the *effective* tax rate on property generally differs from the statutory tax because the tax is determined from the assessed property value not from the market value. This is also true in the current context of the German land tax. Actually, the German land tax is levied on the land value according to the official assessment ("Einheitswert"). But, whereas the current study focuses on a cross-section of land values in 1987 the last official land assessment took place in 1964. The increase in land prices since then has brought up a substantial gap between market values and tax rates and has lowered effective tax rates. More important, since trends in the prices of land differ across municipalities this has created a situation where the effective tax rates may differ even if statutory tax rates are the same. Formally, the estimation problem in the case of the land tax amounts to estimate a function

$$V = V(g, y, \tau V_0/V), (4)$$

where  $V_0/V$  is the assessment rate of property, which is simply the relation between assessed value of land  $V_0$  - in our case simply reflecting the market value in 1964 and V the market value in 1987. Thus, provided data are available on the market value in the last year of the assessment  $V_0$  the effective tax rate is determined by the product  $\tau V_0/V$ . But, obviously, there is a simultaneity issue, since the effective tax rate depends inversely on the market value. A possible solution is to use instrumental variables. Consulting the determinants of the market

value in the year of the last assessment

$$V_0 = V(g_0, y_0, \tau_0 V_{-1}/V_0), (5)$$

where  $V_{-1}$  refers to the value of land in the 1937 assessment. In the light of equations (4) and (5) the statutory tax rates at the two periods  $\tau$ ,  $\tau_0$  may serve as instruments for the effective tax rate. The analysis below utilizes this approach in a cross–sectional dataset of municipalities reporting land values and tax rates at different locations as well as control variables for g and g.

# 3 Data

The basic database consists of the complete set of municipalities in Baden-Württemberg. With a total number of 1111 observations these jurisdictions show considerable variation in demographic, geographic, economic, and fiscal conditions. Due to data limitations, the analysis below focuses on the land value at 675 municipalities, with population above 1000 and where a sufficient number of land transactions is reported.<sup>1</sup>

Two related but different variables are used to study land tax capitalization: the average price of building land (baureifes Land) and the average monthly rent for an apartment. Whereas the former is a measure of the price of current sales of land the latter is an indicator of the rent paid given an existing stock of buildings and apartments. According to the theory the rent level should not be affected by the land tax rate, only the land value should show a negative, capitalization, effect of the land tax. To use these two variables will thus allow us to check for the consistency of the empirical results.

<sup>&</sup>lt;sup>1</sup>The statistical office does not report data on transactions if the number is below a certain threshold. Moreover due to the restructuring of the municipality boundaries in the 1970's tax data referring to earlier periods were not available for all municipalities.

Table 1: Descriptive Statistics

|                                 | Definition             | Mean  | Std.Dev | Min   | Max   |
|---------------------------------|------------------------|-------|---------|-------|-------|
| Land value                      | $DM / m^2$             | 164.7 | 131.1   | 16.45 | 936.9 |
| Land value in 1964              | $\mathrm{DM}\ /\ m^2$  | 19.83 | 17.51   | 2.118 | 127.7 |
| Monthly rent                    | $\mathrm{DM}\ /\ m^2$  | 6.290 | 0.994   | 4.120 | 9.420 |
| Statutory land tax rate         | in $\%$                | 0.863 | 0.091   | 0.648 | 1.295 |
| Statutory land tax rate in 1961 | in $\%$                | 0.855 | 0.133   | 0.325 | 1.250 |
| Approx. effective land tax rate | in $\%$                | 0.113 | 0.055   | 0.027 | 0.583 |
| Apartments / Building ratio     |                        | 1.690 | 0.433   | 1.125 | 4.077 |
| Debt level                      | in 1000 DM per capita  | 1.048 | 0.637   | 0.000 | 4.672 |
| Income                          | in $10000$ DM per cap. | 4.860 | 0.681   | 3.489 | 10.31 |
| Unemployment                    | no.of unemp. per cap.  | 3.598 | 1.177   | 0.861 | 9.525 |
| Population                      |                        | 11.76 | 29.72   | 1.059 | 551.9 |
| Area                            |                        | 384.7 | 323.7   | 25.00 | 2073  |
| Agricultural land               | share of total area    | 0.512 | 0.148   | 0.041 | 0.857 |
| Water area                      | share of total area    | 0.010 | 0.014   | 0.000 | 0.127 |
| Forest land                     | share of total area    | 0.333 | 0.167   | 0.000 | 0.900 |
| Density                         | pop. / settlement area | 0.204 | 0.090   | 0.034 | 0.593 |
| Publ. swimming pools            | per 1000 residents     | 0.077 | 0.127   | 0.000 | 1.127 |
| Sanatorium                      |                        | 0.095 | 0.293   | 0.000 | 1.000 |
| Tennis courts per cap.          | per 1000 residents     | 1.170 | 0.665   | 0.000 | 5.384 |
| Horse riding ground             |                        | 0.373 | 0.484   | 0.000 | 1.000 |
| Theater                         |                        | 0.007 | 0.086   | 0.000 | 1.000 |
| Highway                         |                        | 0.129 | 0.335   | 0.000 | 1.000 |
| Immig. in elementary school     | share of pupils        | 0.110 | 0.075   | 0.000 | 0.425 |
| Wild life reserve (cnty)        | share of total area    | 0.009 | 0.008   | 0.001 | 0.049 |
| Rural preservation area (cnty)  | share of total area    | 0.190 | 0.112   | 0.046 | 0.640 |
| Industry emissions (cnty)       | dust per total area    | 0.011 | 0.022   | 0.000 | 0.444 |

Statistics for 675 municipalities in Baden-Württemberg in 1987.

The land value is defined in DM per square meter of land, similarly, the rent variable captures the monthly gross rent in DM per square meter. Note that the rent variable includes not only the base payment but also additional cost comprising water services, sewerage, and taxes except for heating. The land tax rate used in the study is the statutory tax rate defined by a local multiplier (Hebesatz) and a basic tax rate of 0.35 % (in 1964: 0.50 %) on land value.<sup>2</sup> The sample shows a mean tax rate of 0.86 % and shows some variation from 0.65 % to almost 1.3 %. The effective tax rate is however significantly lower.<sup>3</sup>

Besides of rent and land value and aside of tax rates, several indicators of amenities, disamenities and other local characteristics are used. Table 1 shows descriptive statistics. Aside of density and population size several variables capture the land structure according to the zoning plan in each of the municipalities. The latter includes the share of land used for agricultural production, land covered with water, and land used for forestry. As the monthly rent variable refers to apartments but the property value is the value of land for buildings it is important to control for differences in the improvements of land. Therefore, an indicator of land use is added, measuring the total number of apartments relative to the number of buildings. Some variables capture fiscal and socio-economic conditions: income and unemployment capture the economic conditions faced by the local residents, the debt level indicates limitations for financing additional public services and hence might be important for tax expectations. Turning to amenities, two specific variables capture the presence of wild life reserves and rural preservation areas at the corresponding county level using the share in the total county area. Also industrial dust emissions are observed only at the county level. With regard to local (dis-)amenities, the analysis considers the density in the settlement area, dummy variables capture the presence of sanatoria, horse riding grounds, theaters, and access to a highway (Autobahn). Other indica-

<sup>&</sup>lt;sup>2</sup>Depending on the use and of the price of land, there are tax rate reductions up to a rate of 0.26 %.

<sup>&</sup>lt;sup>3</sup>Actually the mean ratio of assessed to market value of land is approximated at .131 % which corresponds exactly to the figure reported by Bartholmai and Bach (1996) using data for 1988.

tors refer to the number of open air swimming pools and tennis courts related to the population in 1000. A final variable captures school quality identified by institutional restrictions on school choice. Since parents are obliged to send their children to the local elementary school, if they do not choose a private school, the local share of foreign residents among pupils at elementary schools is considered an indicator of educational disadvantages at the considered location.

# 4 Estimation approach

In this first attempt to test for land tax capitalization among German municipalities we run simple log-linear regressions of the land value and the local rent level on local characteristics. Depending on whether the statutory tax rate or the effective tax rate is employed the estimation is carried out using OLS or instrumental variable (GMM) estimation. In the latter case the current statutory tax rate and the statutory tax rate at the time of the last land value assessment are used as instruments.

Aside of the land tax rate, variables which show rather skewed distributions are entered in logs. Preliminary regressions indicated weak significance of amenities. This could be related to the fact that most municipalities are rather small and many of them might gain from the presence of specific amenities in their local neighborhood. Therefore, spatially transformed values of the amenity variables were included. Formally, variable  $g_i$  is spatially transformed into variable  $g_{-i}$  referring to neighboring jurisdictions using

$$g_{-i} = \sum_{j} W[i, j] g_{j}.$$

The spatial weights are defined such that W[i,j] > 0 for neighboring municipalities, W[i,j] = 0 for more distant locations and W[i,i] = 0. The criterion used to define neighbors is set to a distance of 30 km. The weights are inverse distances. Note that we do not employ spatial lags

of the county level indicators related to industry emissions and natural reserve areas.

Whereas in case of amenities spatial lags capture benefit spillovers, in case of the share of foreign residents among pupils at elementary schools the argumentation is slightly different. If this share is high in neighboring municipalities there is a stronger incentive to relocate to the considered location in order to avoid suffering from lower school quality.

As the list of explanatory variables includes spatial lags it is important to control for spatial dependence in the error terms. For both OLS as well as GMM estimates the analysis below employs a heteroscedasticity and spatial-dependence consistent covariance matrix following Conley (1999).<sup>4</sup>

# 5 Results

Table 2 reports results from an OLS regression employing the statutory tax rate as well as results from a GMM estimation employing the approximated effective tax rate.

Consider first the OLS estimation. The coefficient of determination is at 0.803. The income level, as well as unemployment show the expected signs and are significant. Population shows a strong positive and the total area a negative effect indicating a positive association with agglomeration. The two variables capturing natural reserve areas show a positive, industrial

$$\mathbf{S} = (1/N) \sum_{i} \sum_{j} 0.5K(i,j) \left[ \mathbf{z}_{i} \hat{\epsilon}_{i} \hat{\epsilon}_{j} \mathbf{z}_{j}' + \mathbf{z}_{j} \hat{\epsilon}_{j} \hat{\epsilon}_{i} \mathbf{z}_{i}' \right], \qquad K(i,i) = 0,$$

where N is the number of jurisdictions,  $\hat{\epsilon}_i$  is the first-step estimate of the residual, and  $\mathbf{z}_i$  is the vector of instruments. K(i,j) is a two dimensional kernel defined over a regular lattice field with a distinct address for each of the N jurisdictions. The cut-off point up to which a neighboring jurisdiction obtains a positive weight in the kernel is set corresponding to the definition of neighbors used in the spatial weighting matrix, *i.e.* up to a distance of about 30km (18.65 miles).

<sup>&</sup>lt;sup>4</sup>Conley (1999) suggests to compute a consistent estimate of the covariance matrix of the orthogonality conditions (S) using a weighted average of estimated autocovariances

Table 2: Results for Land Value

| Specification                  | OLS        | GMM     | Specification               | OLS     | GMM     |
|--------------------------------|------------|---------|-----------------------------|---------|---------|
| log Statutory land tax rate    | 329        |         | Sanatorium                  | .093 *  | .077 *  |
|                                | [.208]     |         |                             | [.048]  | [.042]  |
| log Effective land tax rate    |            | 314 **  | Tennis courts               | .026    | .025    |
|                                |            | [.128]  |                             | [.023]  | [.020]  |
| log Apartments / building      | .892 **    | 1.10 ** | Horse riding ground         | .035    | .024    |
|                                | [.187]     | [.190]  |                             | [.034]  | [.030]  |
| log Income per cap.            | .372 **    | .387 ** | Theater                     | .227 *  | .034    |
|                                | [.174]     | [.151]  |                             | [.118]  | [.109]  |
| Unemployment                   | 094 **     | 095 **  | Highway                     | .028    | .003    |
|                                | [.023]     | [.019]  |                             | [.039]  | [.034]  |
| Debt per capita                | 027        | 036     | Imm. in elementary school   | 308     | 441 *   |
|                                | [.029]     | [.024]  |                             | [.247]  | [.225]  |
| log Population                 | .361 **    | .309 ** | W log Density               | .093 ** | .059 ** |
|                                | [.093]     | [.086]  |                             | [.026]  | [.030]  |
| log Total area                 | 289 **     | 218 **  | W Publ. swimming pools      | .986 ** | .742 ** |
|                                | [.093]     | [.087]  |                             | [.316]  | [.311]  |
| Share of agricultural land     | 1.03 *     | .631    | W Sanatorium                | .238    | .205 *  |
|                                | [.531]     | [.522]  |                             | [.146]  | [.121]  |
| Share of water                 | 446723 W T |         | W Tennis courts             | .170 ** | .119 ** |
|                                | [1.44]     | [1.29]  |                             | [.047]  | [.046]  |
| Share of forest land           | .926 *     | .534    | W Horse riding ground       | .338 ** | .317 ** |
|                                | [.521]     | [.515]  |                             | [.103]  | [.089]  |
| Wild life reserve (cnty)       | 5.57 *     | 3.03    | W Theater                   | 2.75 ** | 2.00 ** |
|                                | [3.15]     | [2.76]  |                             | [.893]  | [.860]  |
| Rural preservation area (cnty) | .852 **    | .859 ** | W Highway                   | .327 ** | .297 ** |
|                                | [.242]     | [.219]  |                             | [.105]  | [.089]  |
| log Industry emissions         | 068 **     | 064 **  | W Imm. in elementary school | 1.05    | 1.59 ** |
|                                | [.030]     | [.024]  |                             | [.724]  | [.622]  |
| log Density (settlement area)  | .008       | .077    | Constant                    | .862    | .278    |
|                                | [.115]     | [.103]  |                             | [1.13]  | [.954]  |
| Publ. swimming pools           | .204 **    | .161 *  |                             | -       | -       |
| - <del>-</del>                 | [.103]     | [.092]  |                             |         |         |
| Number of Observations         | 675        | 675     | J-Statistic (dof)           |         | 0.05(1) |
|                                |            |         | $R^2$                       | .803    | ` '     |

Spatial dependence and Heteroscedasticity robust standard errors in parentheses. GMM estimates use the statutory tax rates in 1987 and 1961 as instruments. If significant at 0.10 or 0.05 coefficients are marked with one or two stars.

dust emissions show the expected negative effect. Of the local amenity variables, only public swimming pools prove significant. However, most of the spatial lags of amenities are significant pointing to benefit spillovers across municipalities. Even though the share of foreign citizens in local elementary schools proves insignificant, the argument of sorting is partially confirmed since the share in adjacent jurisdictions shows a positive effect. Finally, the statutory land tax rate shows a negative coefficient, which is, however, not significant.

The statutory tax rate may be a rather poor indicator of the effective tax burden. As discussed above, it seems more preferable to use the effective tax rate as defined above. To overcome the simultaneity problem involved, the current statutory land tax rate as well as the land tax rate around the time at which the land assessment was carried out are used as instruments. Note that according to the J-statistic at the bottom of the table, the overall specification test does not indicate a problem with the corresponding moment restrictions. In the GMM estimation the effective tax rate shows a significant negative effect. The other results are rather similar to those obtained from OLS using the statutory tax rate, notably the local share of foreign citizens among children enrolled in elementary schools is significant.

As the current analysis is the first cross-section regression explaining land value in Germany it seems interesting to compare the results with regressions where the land value is replaced by the monthly apartment rent. As shown in Table 3 the results with regard to amenities and disamenities are quite similar. But, regardless of whether the statutory or the effective tax rate is used, there is no significance found for the land tax rate. This suggests that landlords are not in a position to shift the tax incidence of the land tax to the tenants.<sup>5</sup> A further difference to the land value regressions relates to the land structure. In the rent regressions, land not

<sup>&</sup>lt;sup>5</sup>Although this is a standard result in the literature, this is a remarkable finding in the German context, as generally the land tax is listed as part of the side cost (Nebenkosten) which are routinely forwarded to the tenants and are not subject to rent controls. Note, that the analysis deals with the monthly gross rent which explicitly includes side cost.

Table 3: Results for Monthly Rent Level

| Specification                  | OLS     | GMM     | Specification               | OLS     | GMM     |
|--------------------------------|---------|---------|-----------------------------|---------|---------|
| log Statutory land tax rate    | .005    |         | Sanatorium                  | .020 *  | .021 ** |
|                                | [.037]  |         |                             | [.010]  | [.010]  |
| log Effective land tax rate    |         | 002     | Tennis courts               | .006    | .006    |
|                                |         | [.029]  |                             | [.004]  | [.004]  |
| log Apartments / building      | .328 ** | .330 ** | Horse riding ground         | .007    | .007    |
|                                | [.033]  | [.041]  |                             | [.006]  | [.007]  |
| log Income per cap.            | .125 ** | .126 ** | Theater                     | .005    | .002    |
|                                | [.035]  | [.035]  |                             | [.047]  | [.051]  |
| Unemployment                   | 009 **  | 009 **  | Highway                     | 002     | 003     |
|                                | [.004]  | [.004]  |                             | [.009]  | [.009]  |
| Debt per capita                | .003    | .003    | Imm. in elementary school   | 142 **  | 144 **  |
|                                | [.005]  | [.004]  |                             | [.059]  | [.061]  |
| log Population                 | .104 ** | .103 ** | W log Density               | .010 *  | .010    |
|                                | [.023]  | [.023]  |                             | [.005]  | [.006]  |
| log Total area                 | 097 **  | 095 **  | W Publ. swimming pools      | .000    | .003    |
|                                | [.022]  | [.023]  |                             | [.065]  | [.070]  |
| Share of agricultural land     | .514 ** | .505 ** | W Sanatorium                | .078 ** | .078 ** |
|                                | [.118]  | [.119]  |                             | [.038]  | [.038]  |
| Share of water                 | .657 ** | .637 ** | W Tennis courts             | .031 ** | .030 ** |
|                                | [.225]  | [.221]  |                             | [.008]  | [.010]  |
| Share of forest land           | .498 ** | .489 ** | W Horse riding ground       | .018    | .017    |
|                                | [.127]  | [.129]  |                             | [.017]  | [.017]  |
| Wild life reserve (cnty)       | 3.44 ** | 3.40 ** | W Theater                   | .972 ** | .956 ** |
|                                | [.758]  | [.753]  |                             | [.207]  | [.233]  |
| Rural preservation area (cnty) | .149 ** | .147 ** | W Highway                   | .047 *  | .046 *  |
|                                | [.045]  | [.045]  |                             | [.027]  | [.027]  |
| log Industry emissions         | 010     | 010 *   | W Imm. in elementary school | .494 ** | .499 ** |
|                                | [.006]  | [.006]  |                             | [.156]  | [.155]  |
| log Density (settlement area)  | 074 **  | 071 **  | Constant                    | 1.02 ** | .980 ** |
|                                | [.028]  | [.028]  |                             | [.232]  | [.256]  |
| Publ. swimming pools           | 033     | 034     |                             |         |         |
|                                | [.024]  | [.024]  |                             |         |         |
| Number of Observations         | 675     | 675     | J-Statistic (dof)           |         | .212(1) |
|                                |         |         | $R^2$                       | .791    |         |

Spatial dependence and Heteroscedasticity robust standard errors in parentheses. GMM estimates use the statutory tax rates in 1987 and 1961 as instruments. If significant at 0.10 or 0.05 coefficients are marked with one or two stars.

available for settlements shows strong positive significance, which is indicative of price effects due to zoning restrictions. The insignificance of these variables in the land value regressions is presumably reflecting the land supply by the municipalities themselves.

Whereas the results confirm the existence of capitalization, it would be interesting to get some insights into the actual strength of land tax capitalization. To get an impression of the average magnitude of capitalization in the sample we note that the above coefficient estimate reflects a simple elasticity of land value with regard to the land tax rate. As remarked above under full capitalization this should just reflect (in absolute terms) the share of land tax payments in the total cost of holding a piece of land. With the mean effective tax rate of about 0.113 % and with an interest rate of 3 % this share should be around 0.036. The elasticity found is much larger pointing to substantial overcapitalization.

Now this could partly be due to the considerable uncertainty with regard to actual level of the assessment rate which gives rise to the phenomenon of the "disappearing tax base". If the assessment ratio is not correctly measured from the difference in the market value of building land between 1964 and 1987 a higher tax rate might be associated with a more than proportionate increase in the effective tax rate. Since, by depressing the market value, the assessment factor increases. As a consequence the response in market prices will be stronger than the capitalization formula would suggest. However, aside of the measurement problem in the effective tax rate, another explanation for large capitalization effects stems from the significant price trend in land prices. In fact, in the period between 1964 and 1987 the average land prices in the sample have increased by about 9.6 % annually, and, thus, it seems reasonable to argue that land owners anticipate significant price increases. As a consequence, the total cost of holding a piece of land might be substantially reduced. Following the above notation

$$V = \frac{R(g, y)}{r - \pi + \tau},\tag{6}$$

where  $\pi$  denotes the expected rate of change in the land price.<sup>6</sup> Moreover, in 1987 a substantial program of housing subsidies might also have contributed to a larger share of the tax in actual cost of holding land.

Nevertheless, while the rent equations do not show any effect the effective tax rate proves significant in the land price regressions, as is in accordance with tax capitalization theory.

# 6 Conclusions

In this first study on land tax capitalization in Germany we find support for the view that land taxes are capitalized into land values whereas the level of the monthly rent remains unaffected. The actual degree of capitalization implied by the empirical result seems to be rather large, although an actual calculation is difficult given strong positive trends in land value.

When capturing local amenities it proved important to take account of conditions in adjacent jurisdictions. This reflects the smallness of the considered municipalities. The significance of theaters and public open-air swimming pools, which are both subsidized by the municipalities point to significant benefit spillovers across municipalities. Benefit spillovers across municipalities are also found to be exerted by highway access which shows a particularly strong impact on the land values.

Another interesting result is the composition of children in compulsory education, where parents do not have free choice of schools. The empirical results indicate that a higher share of children

$$V = (R (g, y) - \tau V) \int_{t}^{\infty} e^{-r(s-t)} ds.$$

Differentiation w.r. to the starting period t yields

$$\dot{V} = rV - R(q, y) - \tau V.$$

Now if  $\dot{V} = 0$  we are back in the standard case, but if  $\dot{V} = \pi V$  equation (6) results.

 $<sup>^6</sup>$ To see this, assume that the current price of land is equal to the present value of rents less of tax payments. Leaving aside reassessments

with foreign nationality is depressing both rent level and property value. Consistent with the institutional restriction on school choice, a higher share of children with foreign nationality in adjacent jurisdictions is found to raise rent level and property value.

The results also indicate a strong impact of density on local property value. This is important for the reform of the municipal finances in Germany. Under the current system, which basically rests on the business tax, cities experience substantial taxing power. As the land value shows a strong positive relation to density, cities would also experience strong taxing power if the finances of municipalities were reformed towards a greater role of the land tax.

#### **Datasources and Definitions**

All data have been obtained from Statistisches Landesamt Baden-Wuerttemberg.

Municipalities: The basic dataset consists of the 1111 municipalities of the German state of Baden-Wuerttemberg (BW). BW covers a total area of 35,752 square kilometer (sqkm) (13,800 square miles (sqm)) with an average community area size of about only 32.2 sqkm (12.4 sqm). For comparison average US county size is about 1,127.5 sqm (own computations based on County and City Data Book, 1988).

Due to some problems with data availabilty the estimation uses a reduced dataset of 675 municipalities. As can be seen from Table 4, mainly small municipalities have been removed.

Table 4: Size Distribution of Municipalities

| pop. size in 1,000 |        | <1 | 1-2 | 2-5 | 5-10 | 10-20 | 20-50 | 50-100 | >100 |
|--------------------|--------|----|-----|-----|------|-------|-------|--------|------|
| jurisdictions      | N=1111 | 97 | 158 | 419 | 237  | 119   | 60    | 13     | 8    |
|                    | N=675  | 0  | 53  | 255 | 183  | 105   | 58    | 13     | 8    |

1987 population figures.

Land value refers to the sales of building land (Bauland) divided by the area of the transactions in the municipalities of Baden-Wuerttemberg. The figure employed is the average land value over the period 1986-1988. Figures for 1964 are calculated on basis of the average land value in 1970-1972. Using county data for 1970-1972 as well as for 1964, county specific price trends were used to calculate figures for 1964.

Monthly rent refers to apartments of standardized size equipped with bath and kitchen taken from the last German population census 1987. The rent includes additional cost covering fees for sewerage and water as well as taxes (Bruttokaltmiete). Publicly supported housing is excluded.

Statutory tax rate is the implied land tax rate calculated using local collection rates in 1987 and the base tax rate of 0.35 % as defined in the tax code. Due to the restructuring of the municipality boundaries in the 1970's data referring to 1961 were not available for all municipalities. If applicable averages across municipalities were calculated using 1961 population figures.

Income defined as taxable income according to the income tax statistics of 1989 in 10000 DM per capita.

**Unemployment** refers to number of unemployed according to the population census relative to the population of working age in 1987 as taken from the German population census.

**Area:** Figures on area are obtained from the statistics of the zoning plan (Flächennutzungsplan).

Amenities: The list of amenity variables includes the number of open air swimming pools, tennis courts per capita, the presence of water sport opportunities, and of an equitation area all referring to July 1989. Furthermore, a dummy variable captures the presence of a sanatorium in 1988. Also the number of theaters per capita in 1987 is used. Two variables indicate the share of natural resort and land reservation areas in the county or independent

city. Finally the amount of industrial dust emission per county (or independent city) area as an average of the figures in 1985 and 1990 is employed.

Spatial weighting matrix: Euclidian distances are computed from a digital map of the geographical position of the administrative center of each community. The employed matrix defines local neighbors as communities located within a distance of 30 kilometers (km). This results from using commuting of the working population as an indicator of the geographic proximity, as 90 % of the male commuters – as a proxy for full-time employed commuters – have a commuting distance up to 30 km (18,65 miles). This figure was obtained by means of linear interpolation based on relative frequencies of commuting distances published by Heidenreich (1988). Each neighboring community is weighted according to the inverse of its relative distance. Note that due to a better empirical performance, row-standardization is not imposed. This implies, that the total strength of effects exerted by neighboring municipalities is not restricted to be the same across municipalities. If a municipality is located in large distance to others the estimation approach rests on the implicit assumption that it tends to be less affected by its neighbors.

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