

**Property Taxation and Residential Density:**

**Theory and Empirics**

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## **Abstract**

In this paper, we first theorize about the size of a house constructed on a residential lot, measured by height and footprint area. We hypothesize that the property tax rate will have a negative impact on the density of residential construction projects. Using physical descriptions for more than 50 thousand single family homes built in New Hampshire between 1972 and 2006, we find empirical evidence that higher property taxes are associated with both smaller lots and smaller houses. On balance, higher property tax rates are associated with lower residential density.

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# Property Taxation and Residential Density: Theory and Empirics

## INTRODUCTION

During recent decades, rapid population growth and land development have been observed in various parts of the United States. Although much of that growth has been in southern and western metropolitan regions, New Hampshire stands out as a high-growth state in the northeastern quadrant of the nation. As Table 1 points out, rapid population growth in New Hampshire has been associated with a substantial decline in population density of developed areas during the past quarter century.

Some observers point to declining population densities as *per se* evidence of an undesirable phenomenon called urban “sprawl.” We prefer the approach of Brueckner [2000], who defines sprawl as *excessive* growth of the area of a metropolitan region resulting from failure to account for open-space benefits, congestion externalities and incremental infrastructure costs. However one might choose to define sprawl, an important scientific and policy question is what variables drive the rapid geographic expansion of many metropolitan regions in the United States.

In this paper, our purpose is to see whether the reliance of municipal governments on the property tax might be one of those drivers. Theoretical papers by Capozza and Li [1994], Brueckner and Kim [2003], and Arnott and Petrova [2006] have already shown that higher property tax rates could indeed lower the density of metropolitan regions. In the remainder of this paper, we first derive our own theoretical model of property taxation and residential density choices and then test several hypotheses derived from that model using single-family home construction data for 1972 – 2006 for a sample of 41 New Hampshire towns and cities.

<b>Table 1</b>				
<b>Population Growth and Land Development in New Hampshire, 1982-1997</b>				
	<b>1982</b>	<b>1987</b>	<b>1992</b>	<b>1997</b>
Total population	951,000	1,057,000	1,111,000	1,173,000
Developed acres	379,000	468,900	526,000	588,600
Average density	2.51	2.25	2.11	1.99

**Sources: N.H. Office of Energy and Planning for population estimates. U.S. Natural Resources Conservation Service for developed areas.**

## THEORETICAL MODEL AND HYPOTHESES

Our theoretical model of property taxation and land development differs from earlier contributions in several respects. One is that the rents accruing to the owner of a developed parcel derive not just from its location within the metropolitan region and the physical capital constructed on the site but also from the amenities provided by the undeveloped portion of the parcel itself. Second, structures on developed parcels are three-dimensional and hence both the footprint of a building and its height need to be modeled explicitly as development decisions. Third, the ease of substituting physical capital for undeveloped land in the production of “parcel services” needs to be modeled explicitly. Fourth, the effect that building height has on construction cost per square foot should be acknowledged. Fifth, we allow partial tax capitalization in the model with full capitalization as a special case.

A final consideration is that analysis of the impact of property taxation needs to recognize that the conventional property tax is actually two taxes bundled together at the same *ad valorem* rate, one on building value and the other on land value. In this section, we introduce these considerations into a model of the decision to develop a vacant parcel of land within a metropolitan region. An important implication of our model is that it is unambiguous that the portion of the property tax levied on building values affects density of development projects. If the property tax is fully capitalized, the portion of the tax levied on land values reduces the land price paid by developers and is theorized to have little or no effect on density. However, if the property tax is only partially capitalized into land price, then the tax levied on land values could have an effect on density.

Let us suppose that land within a metropolitan region has already been subdivided into parcels and that there are numerous municipalities of roughly equal size within the region. We assume that no additional subdivision or consolidation of parcels is feasible and that municipal boundaries are fixed. A parcel with area  $A_0$  square feet comes onto the market for development or redevelopment at time  $t = 0$ . There are no municipal zoning regulations that might constrain the private developer of the parcel<sup>1</sup> so she or he is free to choose the size of the building footprint ( $F$ ) by selecting the proportion of the parcel ( $\phi$ ) to develop:

$$[1] \quad F = \phi A_0, \text{ where } 0 < \phi \leq 1.$$

This choice of footprint ratio (probably) leaves some of the parcel undeveloped:

$$[2] \quad U = (1 - \phi) A_0.$$

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<sup>1</sup> Of course, land use regulations do pertain in many localities. Ihlanfeld [2007] has found empirical evidence that restrictive land use rules affect house and vacant land prices as well as the size of newly constructed homes. We will take local zoning rules into account in the empirical section of our paper.

If construction is profitable, a structure of infinite life<sup>2</sup> is built on the footprint at time  $t = 0$ . The floor space of that structure ( $K$ ) is approximated by

$$[3] \quad K = h F,$$

where  $h > 0$  is the height of the structure, measured in number of stories. There are no zoning limits on height. By substitution, the size of the structure depends on the parcel size, the proportion of the lot occupied by the footprint and structural height:

$$[3'] \quad K = h \phi A_0.$$

At  $t = 0$ , the developer incurs a construction cost ( $C$ ) that depends upon the square footage of the structure as well as its height:

$$[4] \quad C = c(h) K = c_0 (1 + c_1)^h K,$$

where  $c_0, c_1 > 0$ . This specification implies that capital cost per square foot tends to rise with building height, at least modestly.

The annual service flow provided by the developed parcel ( $s$ ) to its occupants, whether tenants or owners, depends on the size of the structure ( $K$ ) and the on-site amenities generated by the undeveloped portion of the parcel ( $U$ ), call it the “yard”:

$$[5] \quad s = B ( bK^\rho + (1-b)U^\rho )^{1/\rho},$$

where  $\rho$  is greater than or equal to negative infinity but less than or equal to one. In this CES production function, the parameter  $\rho$  governs the elasticity of substitution ( $\sigma$ ) between structure size and the yard area of the parcel in the production of parcel services.<sup>3</sup> To be specific,  $\sigma = 1/(1 - \rho)$ . The service flow produced by the developed parcel presumably depends upon not only engineering and design technologies but also the subjective preferences of potential occupants.<sup>4</sup>

An alternative specification of [5] points out how the service flow from a developed property depends upon lot size as well as building footprint and height. Substituting [2] and [3'] into [5], one finds that

$$[5'] \quad s = B [ b(\phi h)^\rho + (1-b)(1-\phi)^\rho ]^{1/\rho} A_0.$$

This formulation reveals that, once subdivision of the metropolitan terrain has occurred, the service flow from any particular parcel depends upon developer choices about footprint ratio and building height.

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<sup>2</sup> This is a bit of an exaggeration, of course. Harding, Rosenthal and Sirmans [2007] estimate that, net of maintenance, the typical single family home depreciates at almost two percent per year.

<sup>3</sup> In their survey of hedonic pricing models Sirmans, Macpherson and Zietz [2005] report that swimming pools, immediate access to a golf course and pleasant views add value to residential parcels.

<sup>4</sup> A service level of  $s = 1$  could be interpreted, for example, as the use of one standard dwelling unit and its adjoining yard for a year.

Once developed, the parcel yields an annual gross rent ( $r$ ) per unit of parcel service. This could be a cash rent paid by a tenant or an implicit rent paid by an owner-occupant who bought the property from the developer. The annual rent has two components:

$$[6] \quad r = r_0 + (R A_0/s),$$

where  $r_0$  is the rent *per service unit* for the structure and amenities provided by the parcel itself. This rent level is assumed to be uniform across the metropolitan region and constant over time. E.g., there are no neighborhood externalities, either positive or negative.

The other component of annual rent depends upon  $R$  = agricultural rent *per square foot* on farms adjoining the metropolitan region and urban location rent *per square foot* at the parcel's specific location within the region.<sup>5</sup> Agents in the land market expect this rent component to vary over time because of economic and population growth or decline within the region:

$$[7] \quad R_t = R_0 e^{gt}.$$

Before development can proceed, the developer has to purchase the parcel on which construction takes place. Land price per square foot ( $p$ ) at  $t = 0$  equals the present value of expected after-tax agricultural and urban location rents:

$$[8] \quad p = \int [R_t - \delta LT] e^{-it} dt,$$

where  $i$  is the positive and fixed interest rate;  $LT$  is the annual land tax payment per square foot; and  $\delta$  is the rate of tax capitalization that equals one if full capitalization occurs.<sup>6</sup> This specification assumes that the developer forecasts the region's growth prospects accurately and that future land tax payments can be fully or partially capitalized into land price.

The annual property tax payment ( $PT$ ) on the developed parcel has two components, the tax paid on structure value and the tax paid on land value. These components depend upon the assessed values of the structure and its site and upon the constant tax rates ( $\tau_1$ ,  $\tau_2$ ) levied each year on those assessed values. For all years, present and future, we assume that the assessed value of the structure is set at construction cost and the land value assessment is set at acquisition cost:

$$[9] \quad PT = \tau_1 cK + \tau_2 pA_0.$$

Note that  $LT = \tau_2 p$  and that  $\tau_1$  and  $\tau_2$  are typically equal to one another. (However, under a split-rate property tax system like that levied in some Pennsylvania cities,  $\tau_1$  is less than  $\tau_2$ .) From [8] and [9], it follows that land price at  $t = 0$  equals

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<sup>5</sup> For a similar discussion of the rents accruing to a landowner, see Capozza and Helsley [1989]. Note that our model analyzes any arbitrarily chosen parcel within the region but does not theorize behavior of the rent gradient across the region.

<sup>6</sup> If the parcel has been previously developed and is being redeveloped, the price might also include some demolition costs. See Dye and McMillen [2007] on teardowns and redevelopment of parcels.



$$[8^2] \quad p = [R_0 i] / [(i + \delta\tau_2)(i - g)]$$

and that  $i$  must be greater than  $g$  if the price of land is to be positive. It is noteworthy that land price is influenced by the tax rate on land value but not by the rate levied on building value.<sup>7</sup>

At any particular moment, the instantaneous profit of the developer can be calculated as the difference between revenues and costs associated with ownership of the parcel:

$$[10] \quad \Pi_t = r_0s + R_t A_0 - oK - (i + \tau_1)C - (i + \tau_2)p A_0,$$

where  $o$  equals the annual operating cost of the structure (climate control, lighting, repairs, etc.) per unit of physical capital. Substituting from [4], [7] and [8<sup>2</sup>] into [10], one obtains

$$[10^2] \quad \Pi_t = r_0s + R_0 e^{gt} A_0 - [o + (i + \tau_1)c_0(1 + c_1)^h] h \phi A_0 - [(i + \tau_2)R_0 i A_0 / [(i + \delta\tau_2)(i - g)]] .$$

If property tax is fully capitalized into the land price ( $\delta=1$ ), then the tax levied on land,  $\tau_2$ , drops out and has no effect on the profit.

Unless the developer is myopic, he or she will presumably wish to maximize the present discounted value of current and anticipated future profit ( $\Pi$ ) resulting from parcel development, where

$$[11] \quad \Pi = (r_0s / i) - [o + (i + \tau_1)c_0(1 + c_1)^h] h \phi A_0 / i - R_0 A_0 [(i + \tau_2) / (i + \delta\tau_2) - 1] / (i - g) .$$

The first term on the right side represents the present value of the rents paid for enjoyment of the structure and on-site amenities provided by a parcel. The second term is the present value of the annual user cost of physical capital sited on the parcel. If we assume that the current and future land taxes are fully capitalized into land price at  $t = 0$  (i.e.,  $\delta=1$ ), the tax rate levied on land value ( $\tau_2$ ) does not appear in the profit equation. Consequently the growth rate of location rents ( $g$ ) does not appear in this profit equation because any future escalation in annual location rents is offset by a higher annual user cost associated with a higher land price at the moment of parcel development. These results are consistent with the traditional view of property taxation, an approach that emphasizes mobility of capital among competing localities.<sup>8</sup>

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<sup>7</sup> For more on the theory and practice of land value taxation, see Dye and England (2009).

<sup>8</sup> See Zodrow and Mieszkowski [1986] for an extended discussion of property tax incidence.

Assuming that economic conditions do permit a positive profit, what choices of footprint ratio and building height ( $\varphi^*$  and  $h^*$ ) would maximize long-term profit ( $\Pi$ ) for the developer? Under the assumption of  $\delta=1$ , analysis of [5'] and [11] reveals that a global maximum could be found by solving the following pair of nonlinear first-order conditions:

$$[12] \quad r_0 B [b \varphi^\rho h^\rho + (1-b) (1-\varphi)^\rho]^{1/\rho-1} [b \varphi^{\rho-1} h^\rho - (1-b) (1-\varphi)^{\rho-1}] \\ - \rho h - (i + \tau_1) c_0 (1 + c_1)^h h = 0 \quad \text{and}$$

$$[13] \quad r_0 B [b \varphi^\rho h^\rho + (1-b) (1-\varphi)^\rho]^{1/\rho-1} [b \varphi^\rho h^{\rho-1} - (1-b) (1-\varphi)^\rho] - \rho \varphi \\ - (i + \tau_1) c_0 (1 + c_1)^h [1 + h \log(1 + c_1)] \varphi = 0.$$

Because equations [12] and [13] do not have a closed form solution, we cannot derive general expressions for  $\varphi^*$  and  $h^*$ . However, as shown in England and Ravichandran (2008), numerical simulation methods can be used to discover the likely signs of the partial derivatives of  $\varphi^*$  and  $h^*$  with respect to the property tax rate, real interest rate and other determinants of residential density. In the case of full capitalization of land tax, their findings are summarized in Table 2.

<b>Table 2</b>		
<b>Predicted Impact</b>		
(England and Ravichandran, 2008)		
<b>Impact of:</b>	<b>On optimal footprint:</b>	<b>On optimal height:</b>
Interest rate	-	-
Energy price	-	-
Construction cost	-	-
Building tax rate	-	-
Elasticity of substitution between structure and yard	-	?

What these simulations of the special case of  $\delta=1$  of our theoretical model suggest is that, in the absence of constraints imposed by zoning regulations, a higher property tax rate levied on building values will tend to result in shorter residential buildings that have footprints covering smaller proportions of their respective lot areas. The result is that

















