

# Land is back...and it must be taxed

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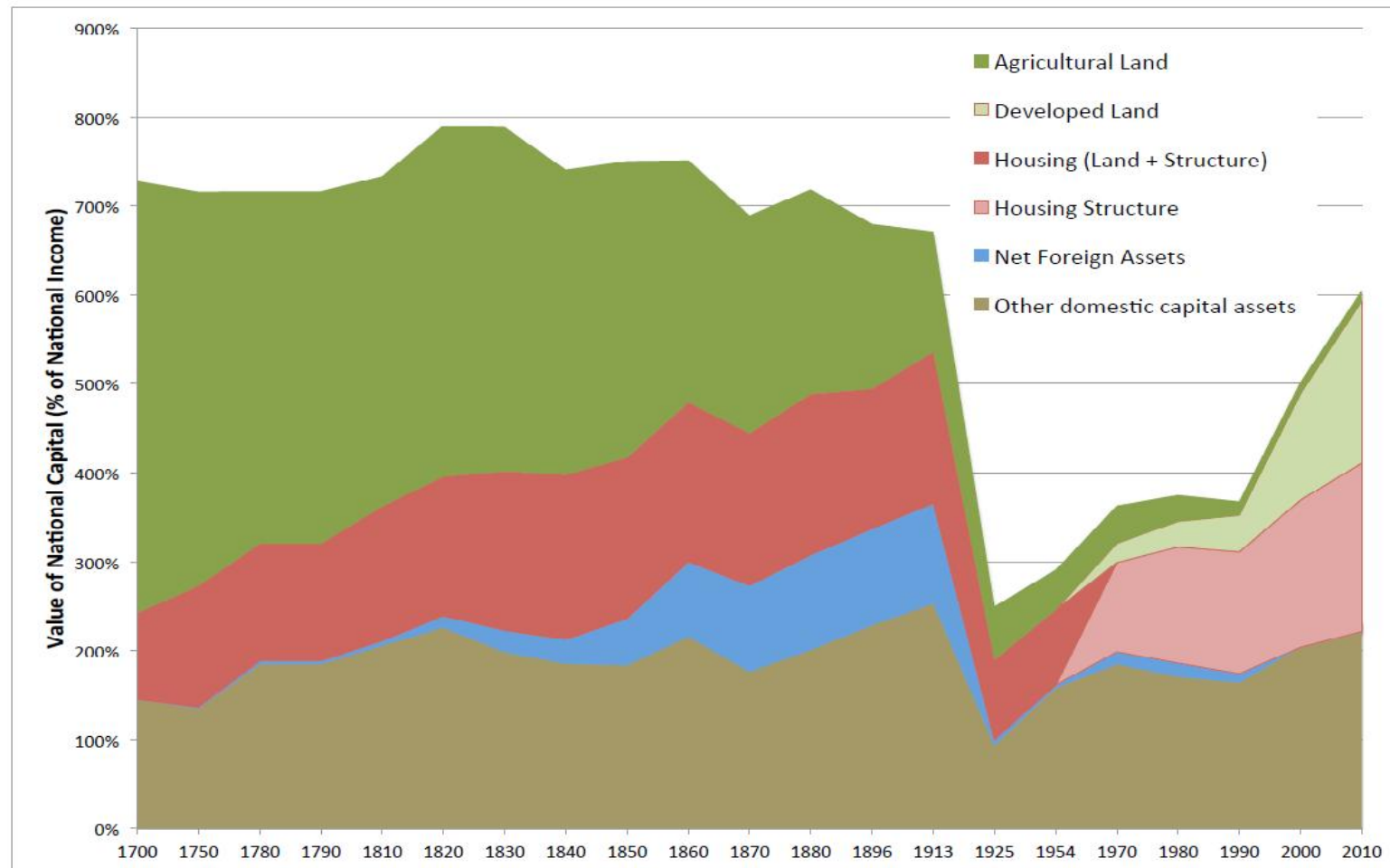
Aix en Provence LAGV June 2016

# Motivation

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- The impetus: “*Capital in the twenty-First Century*”
- Piketty did three things:
  1. From an empirical view point: series about  $K/Y$
  2. From a theoretical view point: exploding accumulation of capital and linkage with growing inequality
  3. From a policy view point: a world tax on capital

# Housing land: main source of divergence of K/Y (France)



# Our reading of Piketty

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## *Empirical side*

1. The evolution of  $K/Y$  is mainly governed by housing
2. The evolution of the market value of housing is mainly driven by land price

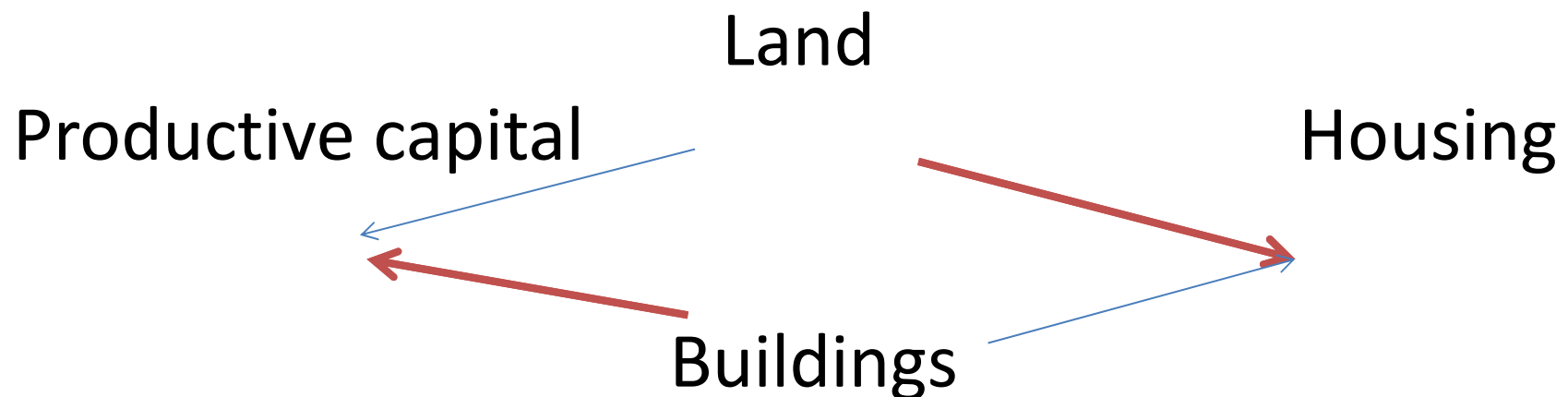


Suppose that we can tax housing land separately from structures.

Taxing housing land as productive capital ?

# How to cope with capital heterogeneity in optimal taxation ?

- Structure (buildings) and land are combined both for productive capital and for residential housing



# Extension of Judd to include housing land

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- Why Judd
- First best
- Second best
- Literature review
- Extensions

# Why Judd (1985) ?

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- Interesting because it borrows from the two Cambridge
- From Cambridge Mass, neoclassical tools
- From Cambridge UK, A 2 social-class model à la Kaldor
  - the capitalists, who own and don't work
  - the workers who work and don't own

# Judd's model

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- Two types of agents, one type of capital, one aggregate consumption good
  - Capitalists optimally choose capital and intertemporally allocate consumption  $C_t$ , and capital investment  $I_t$
  - Workers consume their wages  $c_t = w_t$
- Capital taxation is not first best, and not even second best.
- Judd = Negative Ramsey result.
- Still some mathematical pbs (*Straub & Werning (2015)*)



# Extension to land use and property

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- Two classes: capitalists and landlords vs workers and tenants.
- Benchmark: Housing = Land housing.
- The capitalists own all land  $\bar{H}$
- For their housing use,  $H_t$ , and they rent the remaining to workers  $h_t$
- Purely redistributive aim of taxation to redistribute welfare from capitalists to workers. (No public expenditure)

# Model (I)

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**Capital investment equation:**

$$K_{t+1} = K_t(1 - \delta) + I_t$$

**Utility of capitalists-landowners:**

$$\sum_{t=0}^{\infty} \beta^t U(C_t, H_t)$$

**Utility of workers-tenants:**

$$\sum_{t=0}^{\infty} \beta^t u(c_t, h_t)$$

# Model (2)

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**Ressource constraint of the economy:**

$$c_t + C_t + K_{t+1} \leq f(K_t) + (1 - \delta)K_t$$

**Factor's returns:**

$$w_t = f(K_t) - f'(K_t)K_t$$
$$R_t^{K_{gross}} = f'(K_t) + 1 - \delta$$

**Tax on capital:**  $\tau_{Capital,t}$

**Net return on capital :**  $R_t^{K_{net}} = (1 - \tau_{capital,t})R_t^{K_{gross}}$

**Tax rate of the rent:**  $\tau_{Rent,t}$

# Capitalists/landlords program

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Maximisation program:

$$\text{Max}_{C_t, H_t, K_{t+1}} \sum_{t=0}^{\infty} \beta^t U(C_t, H_t)$$

$$s. t. \quad C_t + K_{t+1} = R_t^{K_{gross}} (1 - \tau_{capital,t}) K_t + R_t^{H_{gross}} (1 - \tau_{Rent,t}) (H - H_t)$$

Euler equation:

$$U'_C(C_t, H_t) = \beta R_{t+1}^{K_{gross}} (1 - \tau_{capital,t}) U'_C(C_t, H_t)$$

Intra-period allocation:

$$U'_H(C_t, H_t) = R_t^{H_{gross}} (1 - \tau_{Rent,t}) U'_C(C_t, H_t)$$

Transversality condition:  $\beta^t U'_C(C_t, H_t) \rightarrow 0$

# Workers/tenants program

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Worker does not save. Live in  $h$  units of rented housing and consume from their wage and of a government transfer  $T$

**Maximization program:**

$$\begin{aligned} \text{Max}_{c_t, h_t} \quad & \sum_{t=0}^{\infty} \beta^t u(c_t, h_t) \\ \text{s. t.} \quad & c_t + h_t R_t^{H_{gross}} = w_t + T_t \end{aligned}$$

**FOC:**

$$u'_h(c_t, h_t) = R_t^{H_{gross}} u'_c(c_t, h_t)$$

# First best setting

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- The Gvt is able to commit to future tax policies
- In a model without land, we already know that the first best can be implemented through
  - Constant tax on consumption for all periods (*Coleman (2000) JpubE*) or
  - Tax on capital with tax credit = tax rate (*Abel (2007 JPubE)*)
  - Way to tax initial capital
- No restrictions on instruments
  - Tax on land
  - Tax on rents including imputed rents

# Program of the social planner

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$$\begin{aligned} & \text{Max}_{c_t, C_t, H_t, K_{t+1}} \sum_{t=0}^{\infty} \beta^t [u(c_t, \bar{H} - H_t) + \gamma U(C_t, H_t)] \\ \text{s. t.} \quad & c_t + C_t + K_{t+1} = f(K_t) + (1 - \delta)K_t \end{aligned}$$

$$\gamma U'_C(C_t, H_t) \ominus u'_c(c_t, \bar{H} - H_t) = \lambda_t$$

$$\gamma U'_H(C_t, H_t) \ominus u'_h(c_t, \bar{H} - H_t)$$

$$\lambda_t / \lambda_{t+1} = \beta (f'(K_{t+1}) + 1 - \delta)$$

$$\text{At the steady state: } R^{Kgross} = \frac{1}{\beta}$$

# First-best taxation

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- A tax on land or a tax on rents including imputed rents decentralizes the first best
- Taxation of capital or rents are not first-best optimal



# Second best setting

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- The set of available distortionary tax instruments is given and the optimal tax system within this set is explored
- Not possible to confiscate initial capital
- Three constraints on land tax instruments
  - No land register
    - Only 50 countries have one (over 200) (*Van der Molen et Al 2014*)
  - The most hated tax: in the US (Cabral-Hoxby (2012)), among the Swedes (Hammar and al.(2008))
    - Cap on the property tax as in California proposition 13 (June 6, 1978).
  - Not possible any more to tax imputed rent
    - Likely because ownership becomes widespread (up to 1963 in France)

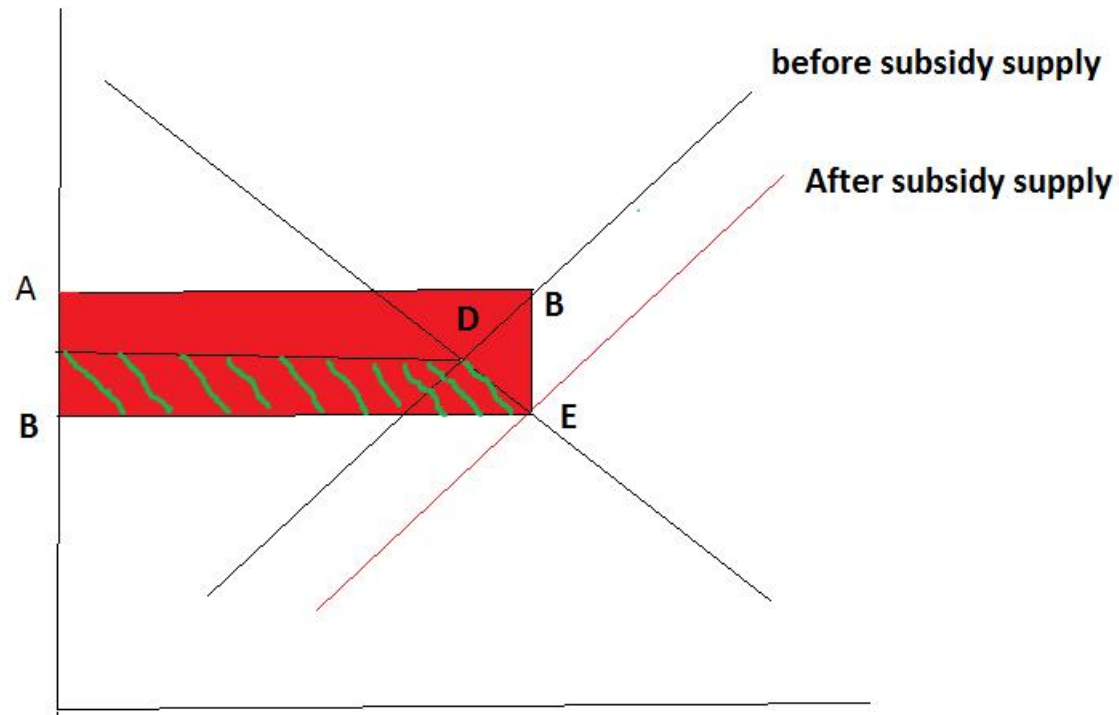
# Ramsey problem

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- Tax on “new” capital vs tax on housing rents
  - Gvt finances redistribution by a flat tax either on rents or capital
- Maximize social welfare under constraints
- Resource constraint of the economy for each period
- FOCs of the capitalist (Euler, intraperiod allocation between consumption and housing, transversality)
- FOC of the worker

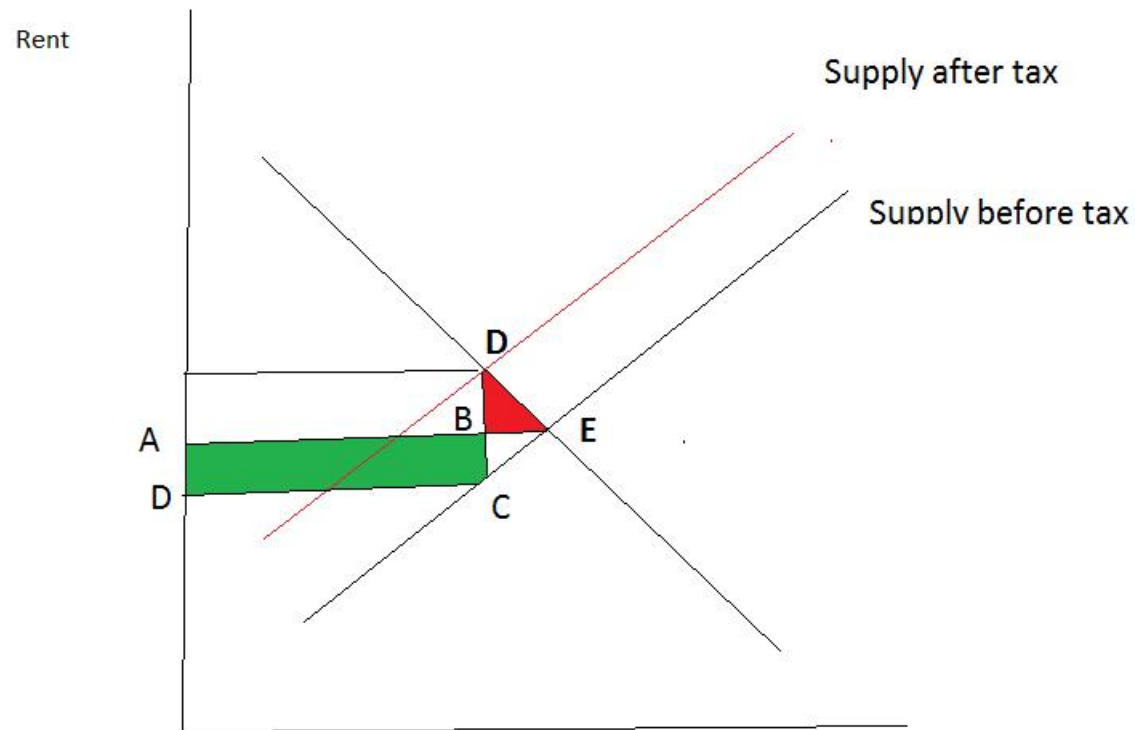
# Housing Subsidy financed by a lump sum tax tenants not in the interest of the tenant

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# But a lump sum benefit financed by a rent tax may be in the interest of the tenant

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# Without Housing: Planner Program

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$$\text{Max}_{c_t, C_t, K_{t+1}} \sum_{t=0}^{\infty} \beta^t [u(c_t) + \gamma U(C_t)]$$

$$c_t + C_t + K_{t+1} = f(K_t) + (1 - \delta)K_t \quad \text{Multiplier } \lambda$$

$$\beta U'(C_t)(C_t + K_{t+1}) - U'(C_{t-1})K_t \quad \text{Multiplier } \mu$$

$$\beta^t U'(C_t)K_{t+1} \rightarrow 0$$

# Statement of Judd's result

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- (Version of Straub & Werning (2015))

## **Theorem:**

*Suppose quantities and multipliers converge to an interior steady state, i-e,  $c_t$ ,  $C_t$ ,  $K_t$  converge to positive values and  $\mu_t$  converges. Then the tax on capital is zero in the limit.*

# Completing Judd's statement

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We define

$$\frac{\gamma U'(C)}{u'(c)} = \alpha \quad \leftarrow \text{Distance to first best}$$
$$U(C) = \frac{C^{1-\sigma}}{1-\sigma}$$

## **Proposition:**

*Suppose quantities converge to an interior steady state. Then, the multiplier  $\mu_t$  converge iff  $(1 - \alpha)(1 - \sigma) > 0$ . More specifically, if  $\alpha < 1$  then the convergence of multipliers occurs iff  $\sigma < 1$ .*

# With Housing : the case of separable preferences

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$$u(c_t, \bar{H} - H_t) = u_1(c_t) + u_2(h_t)$$

$$U(C_t, H_t) = U_1(C_t) + U_2(H_t)$$

$$u_1(\cdot) = U_1(\cdot) = \frac{x^{1-\sigma}}{1-\sigma}$$

$u_2(\cdot)$  and  $U_2(\cdot)$  unspecified



# Local result

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## Proposition

*Consider the steady state of the second best optimum when  $\alpha < 1$  and  $\sigma < 1$  and the tax on capital is zero in the limit. If we consider a small perturbation around the steady state with a small rent tax financing a lump sum benefit to the worker, then social welfare is improving at the margin.*

However, we do not know whether a zero tax on capital is still optimal in the limit in the economy with a rent tax as an additional instrument.

# The optimization pb with housing

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$$\text{Max}_{c_t, C_t, H_t, K_{t+1}, \tau_{Rent,t}} \sum_{t=0}^{\infty} \beta^t (u(c_t, \bar{H} - H_t) + \gamma U(C_t, H_t))$$

$$\text{C1 } c_t + C_t + K_{t+1} = f(K_t) + 1 - \delta \quad \text{multiplier } \lambda$$

$$\text{C2 } \beta U'_1(C_t) (C_t + K_{t+1} - R_t^{Hgross} (\bar{H} - H_t)) - U'_1(C_{t-1}) K_t = 0 \quad \text{multiplier } \mu$$

$$\text{C3 } R_t^{Hgross} u'_1(c_t) - u'_2(\bar{H} - H_t) = 0 \quad \text{multiplier } \eta_1$$

$$\text{C4 } R_t^{Hgross} (1 - \tau_{Rent,t}) U'_1(C_t) - U'_2(H_t) = 0 \quad \text{multiplier } \eta_2$$

$$\text{C5 } \tau_{Rent,t} \cdot \phi = 0 \quad \text{multiplier } \phi \geq 0$$

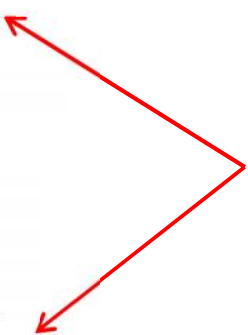
$$\text{C5 } \beta^t U'_1(C_t) K_{t+1} \rightarrow 0$$

# Two parameters

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$$\alpha = \frac{\gamma U'_1(C_t)}{u'_1(c_t)}$$
$$\alpha_h = \frac{\gamma U'_2(H_t)}{u'_2(h_t)}$$

Distance to first best



# Main result

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**Proposition 3** *Assume that the following instruments are available to the decision maker, tax on capital, lump sum benefit to workers, tax on rents. Consider an economy where the preferences of both the capitalist and workers are separable, with a CCRA subadditive utility of consumption. Suppose that quantities converges to an interior steady state and that  $\sigma < 1$ ;  $\alpha < 1$  and  $\alpha_h < 1$ , then the optimal tax on capital is 0 and the optimal tax on rents is positive in the limit . Consequently the stock of capital in the second best remains equal to the stock of capital in the first best.*

# The second best optimal housing rent tax

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**Proposition:** *The optimal rent tax is given by*

$$\frac{\tau^*}{1-\tau^*} = \frac{1-\alpha}{\epsilon_S}$$

*where  $\epsilon_S$  the supply elasticity of rental housing land wrt to net rent*

With CRRA sub-utility of housing  $\epsilon_S = 1/\sigma_H$

$$\frac{\tau^*}{1-\tau^*} = \sigma_H(1 - \alpha)$$

# Interpretation of the result

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- In a static setting, Diamond Mirrlees (1971) shows that it is better not to tax production. Depending on the context, it may be second best optimal to tax consumption.
- In a dynamic setting, not optimal to tax capital because it is productive.
- Housing is a consumption good and under some conditions it can be optimal to tax it.

# Literature review

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- Urban literature
  - The Henry George Theorem: Arnott & Stiglitz (1979)
  - Macroeconomic extension: Mattauch et al. (2013)
- Public economics
  - Housing tax to alleviate incentive constraint on labor income tax: Cremer and Gahvari (1998)
- OLG: clearly an alternative to Ramsey: the optimal capital income tax is non-zero (Conesa, Kitao and Krueger (2009-AER) (36% US))
  - Nakajima (2010): If owner-occupiers are exempted, the optimal capital income tax is almost zero
- Life-cycle savers and capitalist world (Stiglitz 2015): Land but not housing

# Literature review (cont'd)

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- The closest model is *Eerola and Maattanen (EM) (2013)* JPET
- EM extends *Chamley (1986)* with residential construct
- Representative agent: no redistribution concern
- Labor supply
- Gvt can issue bonds
- Taxes finance public expenditure



# Results obtained by Eerola & Maattanen

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- First best setting
  - Tax consumption and housing services at constant rate over time
  - A way to confiscate initial housing and productive capital
- Second best setting
  - Optimal tax treatment depends on the elasticities of substitution between non-housing consumption, housing and leisure
  - Housing taxation used to alleviate distorting effect of taxing labor. (reminiscence of Cremer and Gahvari (1998) in a dynamic setting)

# Extensions first best

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- Residential structure without housing land
  - Not optimal to tax residential structure investment or rents.
- “Tied taxation” housing: Land + residential structure taxed at the same rate.
  - No more optimal to tax bundling housing
- Productive land
  - Should be taxed at the same rate as residential land

# Extensions second best

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- Simulations
- Two limitations of the results
  - Only at the stationary state
  - When “Judd’s result is valid”
- Extensions of the second best
  - Residential structure,
  - Bundling taxation of land and structure,
  - Productive land

# Enlarging the setting

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- Two issues not addressed
- No land market
  - The issue of whether to tax market value or return value
- When young, you rent. When old, you own
  - OLG dimension
- + the issue of implementation of a tax on residential land separately from structure