

December 10, 2025

Alissa Golden MCIP RPP
Program Lead, Cultural Heritage
Planning and Economic Development
City of Hamilton
Via Alissa.Golden@hamilton.ca

Dear Ms. Golden,

Thank you for the opportunity to respond to the Melville Street Heritage Conservation District Plan. As we could not attend the public meetings, we are submitting our comments here, signed by four homeowners in the proposed district. We reject the plan for the following reasons:

1) The designation process was politically driven, not community-driven or initiated in reps. The push for a concurrent heritage district review in 2022—despite the City’s typical one-at-a-time policy—was triggered by election-year politics and a small group’s objection to a single teardown, not by broad local demand. Taxpayer resources were used to advance what appears to be an election tactic rather than a justified planning need. Continuing the process seems to reflect sunk-cost fallacy, more than community support or present threats to heritage.

2) The plan relies on subjective, unchallengeable assumptions. The HCD plan and the Ontario Heritage Act embed subjective definitions of “heritage,” “value,” and “equity,” presented as objective findings but effectively delivered as a *fait accompli*. There is no mechanism—such as a binding vote per property and majority decision—to test actual community support, something that is critical for the success of heritage plans as noted by several heritage agencies.

3) The plan offers no credible evidence on property-value impacts. City-provided sources claiming a “potential” positive effect of designation suffer from weak methodology, outdated data, causal confusion, and clear author bias. They fail to show that designation improves home prices, or even that it is neutral or predictive of home values. While property values are not an official heritage criterion, they are central to many homeowners’ decision-making, and the evidence presented does not withstand scrutiny. **Following this letter, we have dissected the findings of the sources City staff provided on the issue, we encourage Council and all homeowners in the proposed district to read our overview.**

4) The plan imposes onerous, unfunded, and vague compliance restrictions on private homeowners. Section 5.0 lists extensive repair and renovation controls, sometimes vaguely worded, enforceable through a City approval process that may take up to 90 days. Homeowners outside the district with similar homes and taxes face none of these constraints.

5) The plan raises significant equity concerns. Two “tiers” of contributing properties were assigned based solely on the consultant’s assessment—not on ability to afford compliance, length of ownership, recent purchase price, willingness to participate, or evidence of local support. No

phase-in period is offered. An informal review shows that larger, higher-value homes east of Market have already undergone major exterior renovations, rendering restrictions largely irrelevant to those owners — who also likely have greater means. Indifference to the proposal is not support.

Our conclusion:

- The plan favours owners who have already renovated; is neutral to those who have no intention to; and disadvantages those planning to live or sell without undertaking heritage-style upgrades that buyers may demand.
- Vague definitions of what requires approval—and which materials are allowed—create legal and financial risk for owners who misinterpret the rules.
- Requesting permission to alter our own homes is effectively a tax, through potentially higher material/service costs and the burden of navigating approvals. Grants and loans are not guaranteed, cover only part of eligible projects, and may push owners toward more expensive “approved” work they would not otherwise choose. This risks turning the district into a zone where only higher-income owners can afford compliance.
- The plan is only the beginning; future regulations may expand, imposing further obligations on owners who never agreed to any of this when they bought their homes.
- Heritage character has already been preserved organically by owners with the means or good fortune to have homes that fit the historic aesthetic.
- ***There are ~250 contributing properties proposed as designated A or B.*** Is a decision of this magnitude to be determined solely by Council—including only a single Dundas representative who lives, but does not own property, in the district?
- Voluntary preservation has already worked. If further action is needed, less invasive options exist:
 - ❖ Exempting current homes while requiring new builds or teardowns to meet heritage criteria, combined with zoning to prevent non-heritage developments—especially noteworthy given the proposed Brock/Melville multi-unit project will be conveniently excluded.
 - ❖ Requiring compliance only if the City compensates owners proportionately.
 - ❖ Targeting specific homes for restoration grants without imposing district-wide financial or procedural burdens.

Apologies for the length; as Mark Twain said, we didn’t have time to write a shorter letter. Thank you for considering our feedback.

Brad Hussey, Homeowner — Melville St., Dundas (Contributing A property)

Joe Emberson, Homeowner — Melville St., Dundas

Rob Bell, Homeowner — Park St. W., Dundas (Contributing A property)

Randy Cameron, Homeowner — Park St. W., Dundas (Contributing A property)

Assessing Evidence for Claims that Heritage Designation Positively or Neutrally Affects Home Prices

The following sources or references were directly (shared by City staff) or indirectly (cited within documents shared with me) sent in response to concerns over how heritage designation might affect the value of homes in the proposed district:

- a) A non-peer-reviewed McMaster University report (Correia *et. al* 2023), prepared for the City's Planning and Economic Development Department that concluded there "is strong evidence to suggest heritage designation is associated with an increase in property sale values, **though we cannot accurately determine the magnitude of this association.**" This is based on the sale of 222 heritage properties between 1983 and 2022; using a model with several noted limitations in the report, and citing studies with several additional limitations noted. This is far from definitive from an evidence point of view, and the (potential) conflicts of interest baked into the methodology (a report commissioned by the City, involving "regular" meeting with a "City representative" and including among its inputs "13 sources of data" provided by that representative) weakens the veracity of the report (even the appearance of a conflict of interest is, in fact, a conflict of interest).
- b) An Information Report (Effect of Heritage Designations on Property Values in Hamilton (report by Robichaud, #PED20030) that notes "concerns of a negative correlation have largely been anecdotal and based on individual perceptions instead of supporting data." Part of this report notes that a request put to the local Realtors Association noted their organization "did not have data, sales analysis or studies that indicated that heritage protection through inclusion of a property on the Municipal Heritage Register or through designation has led to lower local property values." **Which also means they had no data, sales analysis or studies that indicated that heritage protection through inclusion of a property on the Municipal Heritage Register or through designation has led to *higher* local property values.**
- c) The report then cites 25-, 20-, 14- and 13-year-old papers/reports as data supporting increased property values for designated properties (Galvin 2012; Shipley, 2011 and 2000; Singbeil, 2005). Here's a breakdown of those studies:

- i) **Shipley 2000** appears to present research paid for by the Ontario Ministry of Culture, Recreation and Citizenship and the Architectural Conservancy of Ontario in 1996, involving volunteers from both organizations (there's that pesky conflict of interest again), using data from 208 properties with sufficient sales history between 1976 and 1997. It is rife with serious study limitations, including vague comparators for several data.

Shipley concludes that 59% [of designated heritage properties] performed better than average in their "value history trend" compared to average property-value trends (including non-heritage properties) in their communities; 15% performed in line with average performance of all properties; and 25% performed below average community pricing trends. **Note, the degree to which heritage properties**

outperformed other properties in average sales prices (i.e., how much more or less money they were worth in the eyes of buyers) is not captured; 41% of properties nonetheless either only performed on par with average prices, or underperformed.

Note also that Shipley uses an observational trend comparison (designated properties vs. community averages), and using only graphical trend comparisons and not rigorous statistical analysis) which at best can only show weak association, and not causation.

- ii) **Singbeil 2005** is a non-peer-reviewed report commissioned by the Vancouver Heritage Foundation, which seeks to preserve what it considers heritage properties (a less than objective start to things there). Shipley (whose credentials are not revealed in the report) looked at the value of 45 heritage properties in the Kitsilano, Mt. Pleasant, Strathcona and Sunrise Hastings areas of Vancouver over 1998-2004. **The very small sample size uses only lot size and exterior descriptions of the houses and does not consider any other factors in the values of the homes (i.e., square footage of the homes, nor their interior condition or included amenities).**

Growth in property value was similar between designated (a legal means of heritage protection) and nondesignated heritage properties (a city-maintained list of buildings and structures recognized for their heritage value, but not legally protected or administered): Kitsilano (Designated Heritage 40% growth; Non-Designated Heritage Register 31% growth); Mt. Pleasant (Designated Heritage 45.6% growth; Non-Designated Heritage 47% growth); Strathcona (Designated Heritage 39% growth/Non-Designated Heritage 43.5% growth); Hastings (Designated Heritage 51% growth; Non-Designated Heritage 39.75% growth). Note that all properties, including non-heritage, increased in value in all areas except Kitsilano.

The author concludes: “Designated heritage properties and non-designated heritage properties equaled each other in increased value (630% and 631%), while nonheritage homes increased by 587%.” In other words, designation (legal heritage status) statistically performed as well as non-designated heritage properties.

- iii) **Shipley 2011** mixes qualitative and quantitative data to assess both residents' satisfaction with living in heritage districts and the effect of heritage designation on price. The authors report that 75% of home owners were happy living or owning property in a district, noting “It appears that the stability and predictability of living in a heritage district outweigh the concern about restriction once people become accustomed to it.” **Yet, what the authors did not ask was “Were you happy living in the district before it was given legal heritage designation status?”** Of course people are happy living in neighbourhoods like Melville and Park Streets – we bought homes and continue to live here, in some cases for decades, because we are happy here, and/or because property values have increased and we enjoy our investment – but legal heritage designations had nothing to do with this.

The authors also report that, of the 431 properties in the districts that had sales histories, 44% showed above average sales history trajectories when compared to the properties in surrounding neighborhoods, 34% had average trajectories, and “only” 22% performed below average. **As with the 2 studies above, they do not provide an account of the effect of square footage of homes or interior/exterior condition or amenities in determining sales prices, and therefore cannot realistically determine whether this effect is causative or merely a correlation.**

- iv) **Galvin 2012** is a Trillium Foundation-funded report by the Heritage Resources Centre at the University of Waterloo. Looking at 871 properties in 32 established Heritage Conservation Districts (HCDs) across Ontario, the authors found 42% showed above average sales history trajectories; 34% had average trajectories; and “only” 23% performed below average. (NB: Numbers don’t add to 100 due to rounding.)

A survey of residents in the HCDs revealed 80% were happy living or owning property in a district – **here again, we see a loaded question as we cannot rule out that they were happy before designation, or that they would report happiness regardless of designation status.**

Based on methodologies and strength of data/sample sizes, neither Shipley (in either study), Galvine or Singbeil can rule out that higher-performing properties were already more desirable before designation, and/or existed in highly desirable locations during times of heated real estate sales, and/or contained interior or exterior amenities that would affect price/value regardless of heritage designation, which drove higher values for some properties regardless of heritage status. Nor, by failing to systematically test which local policies or conditions produce stronger or weaker price effects, can they make any reliable conclusions about what effect heritage policies/frameworks have, or not, nor which specific policies/approaches can be connected to price/value increases or decreases.

The reported effect on sales prices is wildly uneven and uncertain, based on small sample sizes and plagued with limitations such as to render them hardly better than opinion expressed as science by people with an interest in heritage preservations, in at least 3 cases paid for by organizations whose stated goals are to create and enforce heritage protections. Galvin makes broad conclusions based on only 871 properties located in 32 highly variable communities.

Although perhaps well-intentioned, these are at best weak and possibly dubious conclusions from an evidence standpoint.