



September 21, 2026
Mayor and Council
City of Victoria
1 Centennial Square
Victoria, BC V8W 1P6

Re: Rezoning Application – 512 Pembroke Street (Matullia Lands at Rock Bay)

Mayor & Council,

On behalf of Matullia Holdings Limited Partnership, an economic development partnership of the Songhees Nation and Xwsepsum (Esquimalt) Nation, we are pleased to submit an updated rezoning application for the Matullia Lands at Rock Bay.

At its core, this application is about establishing a long-term framework for Indigenous ownership, stewardship, economic self-determination, and cultural presence within Victoria's working harbour. The proposed site-specific zone is intended to enable an Indigenous-led employment and innovation district while providing sufficient flexibility for the Nations to respond to changing economic, environmental, and community needs over a multi-generational timeframe.

Vision

The Matullia vision is not a conventional mixed-use redevelopment with industrial uses incorporated as an afterthought. **Employment, industry, culture, and Indigenous economic development remain foundational to the future of the site.**

Over time, the Nations envision the Matullia Lands as a place where industrial and marine activity, innovation, entrepreneurship, cultural expression, ecological restoration, and public life coexist: a working waterfront that generates employment and economic opportunity while reconnecting people with Rock Bay and visibly restoring *ləkʷəŋən* presence to the harbour.

The redevelopment will occur incrementally. Existing industrial activity will continue through the transition, while future phases introduce new employment space, a continuous waterfront pathway, public gathering places, improved connections, cultural expression, and opportunities for environmental restoration. This employment-led vision is also closely aligned with the Industry, Arts and Innovation District Action Plan, which identifies industry, innovation, arts, and **Indigenous economic prosperity** as central objectives for Rock Bay.

Indigenous Context

The context of these lands is fundamental to the application.

The Matullia Lands lie within *ləkʷəŋən* territory and were historically part of a broader landscape of gathering, trade, travel, and stewardship. Following displacement of the *ləkʷəŋən* peoples, the lands were dramatically altered and used for industrial purposes for more than a century, leaving significant environmental and geotechnical constraints – while benefitting many non-Indigenous groups.

The Songhees and Xwsepsum Nations ultimately reacquired these fee simple lands at market value. They are now seeking to steward and revitalize them through the same municipal planning framework that applies to other privately owned land in Victoria.

For Matullia, reconciliation on this site therefore extends beyond cultural expression and acknowledgement. It also includes economic self-determination: creating the flexibility for the Nations to determine how lands they own can generate employment, revenue, opportunity, and lasting community benefit while remaining responsible neighbours within Victoria's working harbour.

That context is particularly relevant because Victoria 2050 expressly recognizes projects that meaningfully support long-term reconciliation and meet the needs of the Songhees Nation and Xwsepsum Nation as circumstances in which departure from the OCP's Urban Structure Concept and Guidance may be considered.

Land Use Proposal

The application is not seeking to convert the Matullia Lands into a residential district or displace their employment function. It seeks a site-specific zone that preserves a broad employment and industrial foundation while allowing greater long-term optionality.

Specifically, the application seeks to:

- Maintain light and marine industrial, employment, innovation, cultural, institutional, commercial, and community-serving uses as the principal foundation of the site;
- Prioritize employment, cultural, and community uses at ground and podium levels, with no residential use at grade;
- Permit **conditional hotel and upper-storey residential uses within DA-1 and DA-2**, subject to compatibility with existing and future industrial, loading, servicing, and working-harbour functions;
- Maintain industrial and employment opportunities elsewhere on the site, including continued marine access and ongoing industrial activity during phased redevelopment; and
- Establish detailed design and compatibility requirements so that any future residential or hotel development must adapt to the employment context rather than constrain it.

The principal policy departure is therefore specific and deliberate: **the ability to incorporate compatible upper-storey residential use within an otherwise employment-led district.**

A Supportable OCP Departure

We recognize that the Urban Industrial Reserve is intended to protect Victoria's scarce employment lands and that its land-use guidance emphasizes marine-industrial, light-industrial, production, distribution, repair, and related employment uses. The City's Rezoning and Development Policy also states that residential uses are not generally supported within the Urban Industrial Reserve.

We are not suggesting otherwise. Rather, we are asking Council to consider the Matullia proposal through the **departure mechanism expressly established within Victoria 2050.**

Policy 1.6.10 allows development to depart from the Urban Structure Concept and Guidance where it is consistent with the City's Principles of Good Urban Design and advances identified objectives, including projects that **"meaningfully support long-term reconciliation"** and meet the needs of the Songhees Nation, Xwsepsum Nation, or the urban Indigenous community.

Policy 1.6.11 then establishes the framework for considering such a departure. Importantly, it asks that an application **support the envisioned general use for the area and demonstrate that the proposed uses are compatible**, alongside appropriate consideration of comprehensive planning, infrastructure and amenities, public open space, scale, and built form.

In our view, that distinction is important. A supportable departure need not reproduce every individual use identified by the underlying Urban Structure guidance; otherwise, there would be no meaningful departure. The relevant question is whether the proposal continues to support the **general purpose of the area** while the proposed departure is carefully managed and compatible.

The Matullia proposal has been structured to do exactly that.

The site remains fundamentally employment-oriented. Industrial and marine-industrial activity is protected, employment uses are prioritized at grade, existing industrial operations can continue through redevelopment, and the zoning and design framework explicitly protects loading, servicing, commercial vehicle access, and other operational requirements.

At the same time, residential and hotel rooms are confined to upper storeys in specified Development Areas and are subject to an agent-of-change approach. Future development must demonstrate appropriate separation and mitigation of noise, vibration, odour, particulate matter, truck movements, loading, servicing, lighting, and other normal impacts associated with an active employment and working-harbour environment.

The proposal also represents a comprehensive planning process rather than an isolated land-use change. It establishes a coordinated framework for phasing, public access, the Waterfront Pathway, gathering spaces, streets and circulation, servicing, climate adaptation, cultural expression, and future development permits. These are the types of considerations expressly identified by Policy 1.6.11.

Accordingly, the requested departure does not abandon the purpose of the Urban Industrial Reserve. **It applies the flexibility contemplated by the OCP to an exceptional Indigenous-led project while retaining the site's fundamental employment and working-harbour function.**

Closing

The Matullia Lands present an unusual convergence of Indigenous history, fee-simple Indigenous ownership, economic reconciliation, scarce employment land, working-harbour activity, significant physical constraints, and a multi-generational redevelopment opportunity.

The Nations are seeking a framework that protects the employment role of these lands while also giving them meaningful flexibility to steward their property, respond to future conditions, and generate lasting economic and community value.

Victoria 2050 provides a mechanism for Council to consider precisely this type of departure. **We respectfully request that the Matullia application, including its proposed upper-storey residential and hotel opportunities, be considered within that framework and in the broader context of Indigenous self-determination, long-term stewardship, and the employment-led vision proposed for the site.**

Sincerely,



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On behalf of Matullia Holdings Limited Partnership (Songhees & Esquimalt Nations)