

**Before an Independent Commissioner of Wellington City Council**

**Under the** Resource Management Act 1991

**In the matter** of a resource consent application for the Future Accommodation Strategy to develop the western portion of the site at 1 Molesworth Street, Wellington

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**EVIDENCE OF HUDSON LAURENCE MOODY ON BEHALF OF THE APPLICANT IN  
SUPPORT OF APPLICATION FOR RESOURCE CONSENT**

**SURVEYING**

**15 May 2023**

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## **1.1 INTRODUCTION**

**1.2** My name is Hudson Laurence Moody. I am a consultant to Spencer Holmes Limited, a firm of engineers, surveyors and planners based in Wellington. I was previously Director at Spencer Holmes for 20 years from April 2001 to March 2021. I have been practicing as a land surveyor since first starting my career in 1974.

**1.3** I am authorised by the Applicant, Parliamentary Service, on behalf of His Majesty the King, to give this statement of evidence on its behalf.

## **2. QUALIFICATIONS AND EXPERIENCE**

**2.1** I am a Licensed Cadastral Surveyor and a Registered Professional Surveyor. I have over 48 years of experience in all manner of land development projects. My experience covers a wide range of survey-related work.

**2.2** My qualifications are as follows:

- (a) NZ Certificate of Land Surveying - Technicians Certification Authority;
- (b) Bachelor of Surveying from Otago University (1991);
- (c) Registered/Licensed Cadastral Surveyor since 1993;
- (d) Registered Professional Surveyor and member of Survey and Spatial New Zealand.

## **3. CODE OF CONDUCT**

**3.1** I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2023) (**Code**) and have complied with it

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in preparing this evidence. I also agree to follow the Code when presenting evidence to the Independent Hearing Commissioner. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses. I also confirm that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

#### **4. SCOPE OF EVIDENCE**

**4.1** I have been engaged by Parliamentary Service to provide the necessary survey information to allow accurate photo montages and Viewshaft related plans and diagrams to be prepared as part of the evidence in support of the Application.

**4.2** My evidence will cover the following matters:

- (a) Plan prepared;
- (b) Methodology; and
- (c) Conclusions

#### **5. SUMMARY OF EVIDENCE**

**5.1** I understand that while the Applicant does not consider that there has been an intrusion into Viewshaft 4A from the WCC Operative District Plan (**ODP**), it wished to confirm that the drawings it had provided as part of the application were accurate depictions of the visibility of the proposed MUS in Viewshaft 4A. I was therefore engaged to undertake a survey of the viewshaft, and prepare a render which demonstrated the proposed location of MUS in that viewshaft.

**5.2** I am comfortable that the render attached to my evidence is based on survey information and can therefore be relied upon as being an accurate representation of the proposed building's location within Viewshaft 4A.

## **6. PLAN PREPARED**

**6.1** I have prepared a plan labelled S23-0022-PH1 Rev B that shows the extent of the proposed Museum Street Building superimposed onto a photograph taken to represent Viewshaft 4A, as defined in the Council's ODP. This plan is attached to this evidence as **Appendix 1**.

**6.2** The photograph that has been used was supplied by Neil Mackenzie, photographer.

## **7. METHODOLOGY**

**7.1** The parameters defining Viewshaft 4A are set out in Central Area Appendix 11 of the ODP. The viewpoint is located at the southern corner of the Whitmore St and Featherston St intersection at an eye level of 1.5 metres above the footpath.

**7.2** For the purpose of the survey work, the viewpoint location was established by matching the view from the street corner looking towards Parliament between the buildings either side to the image in the ODP. This position was then marked on the ground and a high resolution photograph taken with the camera lens positioned 1.5m above the footpath.

**7.3** A theodolite was then set up at the viewshaft location with the instrument height set to 1.5m to match the photograph that had been taken. This survey field work was undertaken by a staff surveyor under my direction.

**7.4** Horizontal bearings and vertical angles were then observed to key building elements that appear within the photograph. Using a survey software package called Magnet, these surveyed bearings and angles were plotted onto a rectangular grid to provide control points onto which the photograph could then be mapped.

- 7.5** When mapping the photo to the grid, more reliance was given to the control points in the vicinity of the proposed MUS building and adjacent existing buildings such as the Beehive, being the main focal point for the viewshaft assessment. That said, the minor distortions present around the edges of the photograph were minimal and I do not believe they affected the integrity of the assessment.
- 7.6** Knowing the design position and height of the proposed MUS building, together with the position and height from where the photograph was taken, it is possible to calculate bearings and angles from the camera location to the extents of the proposed building. This allowed the extents of the proposed MUS building to be added to the viewshaft picture.
- 7.7** My plan S23-0022-PH1 Rev B, attached as **Appendix 1**, shows the results of the survey work and associated calculations. It accurately shows the location of the proposed building within the viewshaft.

## **8. CONCLUSION**

- 8.1** Being based on survey information, the viewshaft render that I have prepared can be relied upon as being an accurate representation of the location of the proposed MUS building within the viewshaft.

**Hudson Moody**

15 May 2023

## Appendix 1

VISIBLE EXTENT OF  
PROPOSED MUS BLDG  
SHOWN HATCHED

RL 40.15

CAMERA POSITIONED 1.5m ABOVE GROUND  
AT THE IDENTIFIED VIEWPOINT LOCATION  
ON THE FOOTPATH CORNER OF WHITMORE &  
FEATHERSTON STREETS

S23-0022-Photo 1 - S23-0022-PH1a

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## VIEWSHAFT 4A

VIEW LOOKING NORTHWESTWARDS  
ALONG WHITMORE ST TOWARDS  
THE BEEHIVE & TINAKORI HILL

PREPARED FOR PARLIAMENTARY SERVICE

DRAWN **H Moody**

DATE **09-05-2023**

SCALE **No Scale**

DRAWING NUMBER  
**S23-0022-PH1**

REV  
**B**