

to the stores in Timaru 1,174 tons of grain and wool. This appears to have been carted by Waimate people using the Main South Road 109 tons, and from Waimate people using the Otipua Road 1,065 tons, making a total of 1,174 tons.

The Levels people send 1,340 tons, which come as follows: By Otipua Road, 729 tons; by Main South Road, 611 tons: total, 1,340 tons, as shown by store return. I again apply the same principle, and say that from the mileage we should take three-fifths off, to see our tonnage; and three-fifths of 1,340 tons equals 804 tons.

Then, as to the return from Waimate (Exhibit 22), by that estimate it is shown that the average of 30 or 40 bushels to the acre is too high. We did not make any deduction for seed or consumption of grain on the farms, and probably we put down too much for the crop, and in dealing with three sets of tests we should apply to both counties the same test in each case.

Of the total tonnage which comes over our roads 790 tons are grain and 50 tons are wool, showing that the produce of grain over 6,923 acres equals one-ninth of a ton of grain per acre, and that the produce of 50 tons of wool over the same area shows one one-hundred-and-fortieth of a ton of wool per acre of the same area. The totals are—740 tons of grain, 50 tons of wool: add Elworthy's 367 tons exclusive of back loading; Squire, 3 tons; Evans, 3 tons: total, 1,163 tons, as per this statement, carted over our roads from Waimate, exclusive of back loading.

I will apply to the Levels farmers mentioned in Table B the same estimate, namely, one-ninth of a ton of grain per acre and one one-hundred-and-fortieth of a ton of wool per acre for the whole area of 8,574 acres. We have only dealt with the productive part. 8,574 acres on this basis produces 952½ tons of grain and 61½ tons of wool—total, 1,014 tons; and three-fifths of this 1,014 brings down the cartage to 618 tons. On each of these three methods of dealing we see that there is a large preponderance of traffic from Waimate over Levels. In Table A thirty-two settlers, including Elworthy, bring light traffic over these roads. In Table B the light traffic from Levels farmers is fifty-eight, and if we take three-fifths of this for an average it reduces them to thirty-five. There is also an immense quantity of Waimate sheep come by this road because the Upper Pareora is pastoral, whereas the Lower Pareora and Levels are more grain-producing.

There is more difficulty as to the Great South Road. We have shown, from the store return, that 104 tons of heavy traffic come on that road. From Hansen's tally we show an immense superiority of traffic over the bridge from what comes the other way. We have Hastie's evidence that considerable numbers do their potato-carting over the bridge, and we have the fact, in addition, that Pentham Hills and Studholme wool come over this road. It has also been shown that at intervals, owing to the shortage of trucks, there is a cartage of grain and produce. The point I would wish to emphasize is, that two farmers have granaries at the railway-station where they can stock their grain till trucks arrive, but the immense majority of settlers have no granaries and must cart the grain if they have no trucks. The light traffic conceded across the bridge from Pareora Riding is very large. The farms shown on the map in pink are 125 farms, and these all send goods to market. The heavy traffic is once a year, but the light traffic is once a week in each case, so I say that the so-called light traffic is very heavy. The number of Levels settlers is thirty-nine, so that the proportion of Waimate farmers is three or four times as large as Levels; and as regards the Levels farmers we ask for a three-fifths reduction, because they do not all use the whole road. As to the sheep, the Stationmaster shows that half the sheep from that district come along the road. The only deduction which the other side contend should be made is that shingle is carted by themselves for maintaining the road, and certain sand from Normanby. On the other side there is also the traffic of a few Levels farmers over the Pareora Bridge. This is a case which loudly demands redress. We have met the other side by asking for a contribution in conference, and were refused. Then legislation was attempted, and we were not successful. We complain that our county is used as a thoroughfare to the Borough of Timaru, and that it is only equitable that we should get a contribution. The Levels County is not used for interchange of traffic.

*Mr. Kinnerney* said, Table 20A had been sworn to by our witnesses. The actual quantities produced by farmers using this road are sworn to by our witnesses. This is not a question based on expectation of all the wool and all the grain; it is made by men who know what they speak about. As to the Cave-Cannington Road, *Mr. Raymond* suggests that it affords access from Waimate to Mackenzie, but it is only Mackenzie County that can claim. Applying section 8 of the Act of 1900 in this case, it means that where any road in Mackenzie County is largely used by Waimate County it does not apply where the whole matter is governed by section 250 of the Counties Act of 1886.

The following evidence was taken by consent, on behalf of the Waimate County, before the commencement of this case on the 25th April, to enable the witness to leave for his home:—

*Charles Henry Howarth* sworn.—Is a member of the Institute of Civil Engineers. Has been twenty-two years Engineer for the Southland County Council, and resides at Invercargill. There were twelve hundred miles of road in Southland County, and this was one of the largest counties in New Zealand, and all the roads were constructed under his supervision. They were constructed in a similar manner to those in South Canterbury, and the material used was also similar. Yesterday made an examination of the roads referred to in the Levels County Council's Overseer's report. In his opinion the works proposed, considering the quantities to be put on, show that the claims are for construction. They are considerably in excess of the annual maintenance reasonably required. They are altogether unreasonable. Generally the roads were in good condition. They did not show signs of very heavy traffic. Assuming there had been much wet weather lately the condition of the roads was good. Has made notes on the various items apart from *Mr. Bremner*.