

3089. I think if you will look at the plan you will find it is figured 3ft.—No, I have never found it.

3090. They were supposed to be 3ft.—They scale 3ft. 4in. at least.

3091. What do these ambulatory-walls measure where the footings are indicated on the original plans—what does the foundation as put in measure?—You can get it on my plan; I have it there.

3092. You only show one side?—I take the outside and the inside to be the same.

3093. But I want to know what it is?—It is given there.

3094. The point is this: I want to get from Mr. Hay how he has made his calculation. You have had it in evidence from three individuals that they could not possibly take measurements from this plan. I want to know how it was arrived at?—I have taken the average of these sections given.

3095. You have not taken the wall as it is?—I have taken it as shown there; I did not expose the whole wall and measure every foot of it.

3096. You said before you did not measure the thickness of the walls?—I have given you sections on the two sides.

3097. No, you did not give a section on that side at the same pier—not exactly at the same place. Then how can you arrive at the thickness, supposing there are irregularities in the wall?—There has no business to be irregularities in it.

3098. I am not asking you what the business is; but, supposing there is, can you possibly from your section get the thickness of the wall? It would guide me a good deal.—You could not measure it every 6in.

3099. You say you have two sections, one showing the one side, and the other the other side at different places?—Very near hand.

3100. Very many feet from one another. You have only taken four measurements in 81ft.?—That is quite enough.

3101. You have taken one at the extreme end, and two equidistant. I ask you again, if you put this plan into the hands of any man who had not taken the measurements himself, could he get the cubic contents of that foundation from it?—Yes, if he understood a plan.

3102. Well, I have been used to taking measures all my life, and I could not?—Very likely you did not want to in this case.

3103. I do not think it is right for you to say so. I think that is an unjustifiable remark of yours. I am simply wanting to arrive at the truth, not to put you in a false position; and I think the remark most uncalled-for and insulting—very insulting. You have no right to suppose that I am here to speak anything but the truth, as I give you credit for doing. Then, Mr. Hay, you cannot tell me how a stranger not acquainted with this plan, a man who had never seen the plan before—can you tell me how he could take the cubic contents of this wall from it?—The man would know that the thing would be the same on both sides, or that it ought to be the same on both sides.

3104. Well, leave it there. You told me you did not measure the thickness of the back wall?—No; Mr. Hunter measured the thickness of the back wall.

3105. Did he give that thickness to you?—He told me of it.

3106. You said the back wall would not carry the weight of the superstructure, and that you did not allude to the concrete, but to the clay underneath?—Yes, the clay underneath.

3107. Would you be very much surprised if that wall cracked before any weight was put on it at all?—I have seen since from your evidence that it did crack.

3108. If I were to tell you that Mr. Brindley says so—putting myself out of the question, as I am not supposed to speak the truth—that Mr. Brindley said it cracked, that the foreman said it cracked, and that James Gore said it cracked before bricks were put on the wall, would that alter your opinion?—No.

3109. Before any weight was on the wall you say the foundation settled of its own weight?—It depends upon the condition the clay was in at the time. I do not know how the wall was. This wall [pointing to plan] seems to have stood for a considerable time.

3110. You said it would not carry the superstructure?—No; I said that it was dangerously loaded.

3111. It has been proved in evidence that there was a crack in this wall before there was one ounce of weight put upon it: will you still say that the clay was not sufficient to carry the superstructure?—Yes; I still think the clay was dangerously loaded. The expression I used was that the clay foundation was dangerously loaded. I explained that before.

3112. You also said it had the advantage of having earth at the back, which assisted the foundation?—The friction of the earth at the back.

3113. Provided the earth at the back was shown to be of a loose and porous kind of material—clay, or whatever it might be composed of—carrying large quantities of water, would you still think that would be a support to the wall?—It would be a support, but in a less degree.

3114. You think it would support it?—It would be some support.

3115. Do you not think that the back-pressure of this clay, with water percolating through it to a very considerable extent, would have a tendency to throw the wall over instead of supporting it?—I know that quite well, but that is a different thing: the friction would also prevent it from sinking.

3116. But would there be much friction in a clay-bank soaked with water?—No; but some.

3117. You think that would have a tendency to keep the foundation up?—It would, especially if dovetailed in with a few boulders.

3118. You are supposing a thing?—I have seen it in other parts of the foundation.

3119. You have seen boulders dovetailed into the concrete. Will you be kind enough to say where, please? However, there is no use in following that up. Do you say this clay-bank at the back of the north-ambulatory wall, with this water percolating through it to a great degree, would not rather have the tendency to throw the wall over than to support it?—It would have a tendency to throw the wall over; but remember that throwing over and sinking are two different things.