

The annual sheep returns show for those in Table A 74,700 sheep. If this is multiplied by 7 lb. wool per sheep it equals 233 tons, which is closely approximate to 214 tons above. The sheep traffic on the roads is very heavy. One witness estimates 50,000 sheep on this road. Thus Elworthy's have 60,000 sheep, and according to experts these will give 25,000 lambs. If 5,000 be deducted for deaths, &c., 20,000 will be the surplus stock every year. Where do they go? We say they all come along this road.

Brassell's Road is almost indistinguishable in evidence from this road—viz., Otupua Road. Table A shows those who use Brassell's Road ford so far as we know. About 4,000 acres on Waimate side use Brassell's ford. Table G shows ratepayers in Levels who use that ford. It is apparent that this road exists chiefly for convenience of Waimate settlers. It is chiefly used for the cartage of grain, and is not used for cartage of Levels produce.

Great South Road: Here the volume of traffic is less than on the other road, but this refers only to heavy traffic. The light traffic is greater than on Otupua Road. Table C (Exhibit 5) shows 1,756 acres in Waimate using this road. That gives the total tonnage on the same basis as 507 tons. Table D (Exhibit 6) shows the Levels ratepayers who use this road. Their acreage totals 7,776 acres, from which the estimated tonnage is 3,204 tons. This must be halved, because half the ratepayers collectively use the whole road. This tonnage equals 1,602 tons. This gives a proportion—as 3 is to Levels, so is 1 to Waimate. We claim one-third. This is a low estimate, as several people live on the river half-way between the two bridges, and they sometimes use one and sometimes the other roads. A return will be put in from the grain-stores. This shows a considerable number of persons using the road for grain traffic who are not on the lists. This, also, does not include light traffic and sheep, which are very large as against Waimate.

Two bridges: The same evidence as to the roads applies to the bridges. Each county now contributes half. We ask for two-thirds. The Waimate traffic over the Upper Bridge—a larger proportion goes over the Lower Bridge. The ford is only used when the bridge is in direpair as at present. The bridge is of more convenience to Waimate than to Levels. The tally was taken over the Lower Bridge. Mr. Hansen took it on Waimate side for thirteen days—viz., from the 4th April to the 18th. The estimate of sheep coming over the Lower Bridge from Waimate by tally was 14,550 or one thousand a day; light traps, 72; persons carried, 104; drays and wagons, 17: from Levels—Sheep, 300; traps and carts, 11; persons carried, 14; drays and wagons, 4. This tally is valuable for roads also. In answer to question as to why two-thirds is claimed for bridges and only one-third for roads, seeing that only part of it goes over the bridges, it may be stated that all Waimate traffic comes this way and use the bridges, but all Levels traffic comes, but does not use the bridges.

Cave-to-Cannington Road is a boundary-road between Levels and Mackenzie Counties. At present each county contributes half to upkeep of the road. We seek to make Waimate contribute half of our share. Table E. [Exhibit 7] shows 18,491 acres using that road. Two big estates—viz., Cannington and Pringle's—are included. They use the whole road. It is their natural outlet to the Cave Railway. Table F shows the Levels ratepayers who use the road. There are only two totalling 1,800 acres. We claim one-fourth in this case. As to the arrangement with Mackenzie this has nothing to do with the case. It is one between ourselves and Waimate.

Estimates of Work required: These show the work required to put the roads into efficient repair. This work was never intended to be done all at once. The Engineer has shown what work would, if done, keep the road in order ten or twelve years. It is simply a question of maintenance. The figures claimed show that for the two chief roads Otupua will cost £810 and Main South Road £808; and the Engineer says that these works require to be done. During the last three years Otupua has cost £247 a year and Main South Road £158 a year. The proposal was to show what, if done, would keep roads in order for a number of years. There was no need to give an estimate at all. The claims are moderate, they are even too small. The Commissioner is not bound by the proportions claimed. The main question is as to traffic. If we prove that the roads are largely used we are entitled to a proportion of the cost of maintenance. There is here no question as to access. It is clear that these roads are causeways. The evidence will show the justice and equity of the matter. Elworthy's Estate alone pays £687 rates for the use of one mile of road. They use eleven miles of our roads without payment. If we prove that roads are largely used we are entitled to a contribution under section 8 of "The Public Works Act, 1900," and section 114 of "The Public Works Act, 1894."

EVIDENCE FOR LEVELS COUNTY COUNCIL.

Samuel Hansen sworn.—Is a farmer at Lower Pareora Bridge, on Levels County side. Has known traffic for nine or ten years. Traffic consists of grain, wool, skins, and miscellaneous. Knows part of Pareora Ridings. Traffic over Lower Pareora Bridge comes from Waimate, chiefly from Lower Pareora Riding. Has seen Waimate traffic outside that riding—viz., Pentland Hills wool—come to Timaru. It is on the other side of the Borough of Waimate. It came in two four-horse wagons, about four trips each. The carter was Luke. Has been through table D and knows every one of these people and their farms. They send all their produce by road, and it comes over the Main South Road. Do not remember any others. Kept a tally of traffic from 4th to 18th April. (This is the statement I made and these are the books I kept). One shows people who crossed from Waimate side. Levels people going into Waimate are also shown in the book. Prepared statement as above and the results are correct. The tally shows a very large proportion of Waimate people over Levels who use the bridge. From his observation a larger number come from Waimate to Timaru than go over from Levels to Waimate. His general observation confirms the tally. There is a settlement on other side of river, and people must come into Timaru to fetch their produce in and to take back stores. Springbrook Settlement is close to the river on Waimate side. From Lower Pareora Riding eleven out of every twelve come by the road. They grow grain, root-crops, and a few sheep and cattle.