

Elevation would mean the alteration of the grades, &c. ?—Yes, it would be very expensive, and would mean a matter of millions.

And then when you come to the cost of operating, I think you said that if you have a modern station constructed now with all conveniences you can work it more economically than you could work a station which you have to add to ?—That goes without saying.

Mr. MacLean's scheme involves the taking of a considerable quantity of land ?—Yes.

What is your experience, as a rule, in connection with the taking of land for stations ?—That you have to pay through the nose for it—top prices always.

As a rule has the Department in the past taken enough land for station-sites ?—No.

Would you say, then, that it is better to take more when you are taking a new site like this than to be more conservative and then take land afterwards ?—Undoubtedly.

Mr. Luckie.] Up to the time you left the service the question of a deviation had not been considered by the Department at Palmerston North ?—No.

Apparently nearly all your negotiations with a view to increasing the facilities at Palmerston North centred round the closing of Cook Street ?—Yes, mainly.

And had those difficulties been satisfactorily overcome and Cook Street closed, having acquired the land fronting Church Street that you did for the purpose of improving the conditions in Palmerston North, you would have no doubt made use of it for shunting and for the purpose of laying rails, would you not ?—Yes ; that is what the estimate of £40,000 was given for in 1911 or 1912.

Then, assuming that there would have been no difficulty about the closing of Cook Street or West Street, would it not have been possible, and indeed convenient, to have acquired the land lying south of West Street down Kairanga Road and improved the station-accommodation in that way ?—No, I cannot say that definitely.

You would then have had a more compact block of land of the necessary width and the necessary length, which could have been added to from time to time, and you could have increased the railway facilities. At any rate, when you were negotiating for Cook Street, there was no thought of deviating the station—the only thought was of improving the conditions where they were ?—That was the proposal at that time.

And that could have been effected by acquiring further land to the south ?—Not definitely ; but there comes a time in every business when a great change becomes necessary, and the man who is there at the time and who has the brains to foresee it takes it up. That has been done in this case.

You mentioned the question of the saving of half a mile of haulage : where would that saving be effected ?—It would be effected on all the main-line traffic between Wellington and Auckland.

But the reverse would be the case between Longburn and all the traffic that came through the Gorge, would it not ?—No, I think not. It would possibly be about the same in length, but that is a small portion. Temporarily it may be as you say, but that is not where the bulk of the traffic is—only 25 per cent. at the outside.

The proposal would involve a complete change in the station at Longburn, would it not—it would have to be pulled up and relaid ?—It would have to be rearranged.

Kairanga Road is mentioned as a road necessary to be bridged, but that road is only slightly used ?—I do not know personally, but I am given to understand it is the main access from the west coast and abattoirs. It is one of the main road-lines of the district.

#### COUNSEL'S ADDRESSES.

Mr. Luckie : Mr. Chairman, I only wish to make a short statement. It would be a matter of entire supererogation on the part of either of us to address you on the evidence which has been given. It is almost a matter of expert testimony which you gentlemen are better able to weigh. I only desire to say that the people whom I represent, while appreciating the absolute necessity for drastically improving the railway conditions at Palmerston North, submit that those alterations could be more effectually carried out at a site which could be acquired, they say, in the neighbourhood of the present site, and at the same time result in a saving of expense and delay, which we say would be much greater if the proposed deviation were adopted. It was merely for the purpose of putting these submissions before the Commission that the evidence of the experts was obtained ; but it must be understood that they were naturally working under most difficult conditions in view of the fact that they were obliged to submit to the Commission estimates arrived at at very short notice, and therefore were unable to go into the same amount of detail as the representatives of the Railway Department in connection with their own proposals. What we desire to show is that if given—and this is practically admitted—the necessary additional area in or about the site where the station now stands, similar facilities can be supplied at much less cost than is proposed by the Railway Department. The Railway Department, on the other hand, insists that, so far as the cost is concerned, there will be little or no comparison between the two proposals. It therefore becomes a question for you gentlemen to consider, and you are in a much better position to say what reliance is to be placed on those estimates. I cannot carry the matter any further. I think a good deal more than is necessary has been made of the level-crossing question, except in shunting-areas. Our proposal suggests that all shunting over the Square and except over two or three streets can be avoided. Those streets, barring Cook Street, are not of very grave commercial importance for traffic purposes ; and the grave dislocation of the trade, the innumerable injustices that must necessarily