

WHO IS JANE OR JOHN DOE?

Unfortunately, I am but one person, who has attempted to sift through several thousand pages of the Jupiter EIS and its annexes. I have, however done this with a single focus, and with one question in mind that I have not yet found an answer to from within this proposal's EIS:

Who, as either an individual or an organisation has accepted ownership of the design of the Jupiter wind farm turbine placement?

Analysis of the proposed turbine placement does not appear to share any conformity with similar projects within the local area. All other wind farms have a common design trait of placing turbines in lines, abreast of the prevailing wind. Jupiter does not follow this methodology. In fact, it defies it. The Jupiter proposal has turbines apparently randomly placed within the boundaries of what little land that could be coerced into association. This placement demonstrates desperation, not sound engineering practice.

Construction of a building requires an architect to put their name, expertise and credibility on its design. Similarly, an engineer must also validate the integrity of the foundations and construction techniques. A builder then stakes his license on the fact that he will faithfully erect the structure in accordance with the plan along with any caveats applied to ensure that it is sound and true to the principles and integrity of its design. The design is cornerstone to the success of the project.

Why are these basic construction principles apparently not a requirement of this \$300M proposal?

Who has designed this apparently visionary, bold and non-industry conforming layout? Nowhere in the EIS has any individual or organisation taken ownership of this design. As a result, who can be called upon to answer under what principles of engineering were any or all of the design decisions made? What were their formal qualifications and experience, and what relevance are those qualifications and experience to the design as proposed? What **best practice methodology** has been incorporated into the design? Why does this design appear to disregard other published wind farm guidelines, such as the NSW Wind Energy Handbook, where in order to adequately mitigate inter-turbine turbulence and its undesirable affects upon turbines, it is **mandated** that turbines be placed 5 rotor diameters apart across the prevailing wind, and 8 rotor diameters down-wind from each other?

Does the Department of Planning and Environment require that the most fundamental and crucial aspect of this proposal, that being the turbine layout be subject to any kind of peer review? If not, under what possible rationale is this neglected? Does such a review mechanism even exist? At the absolute minimum, a peer review of the design would result in **at least one** organisation or individual accepting professional responsibility for the design against their credibility and future in this industry.

IS THIS PROPOSED TURBINE LAYOUT IN FACT EVEN SUPPORTABLE AT ALL?

Surely the Department of Planning and Environment does not accept that compliance testing would be an appropriate the time to discover that fundamental flaws render the entire project inoperable? Who is accepting this \$300m risk other than the residents that are stuck with the result? If it is found to be unfit for purpose by design, how is the community protected? Is it simply left to rot as has happened in other countries such as the United States, or will there be a binding condition that it be removed immediately and the ground returned to its original condition??

It beggars belief that a \$300M State Significant Project can be designed around principles akin to throwing darts at a map of the proposed area. As cheap (and nasty) as this option may be, it is totally unacceptable for the Department to recommend this proposal proceed without **any** entity being prepared to accept formal ownership of its design and the subsequent risk of that design.