

Monday, 22 June 2026

Outline of Submissions

Anton Tutoveanu v Minister for Environment and Heritage

Injunctive Relief

1. Equity, equitable interest, administration of Crown trust.
2. Applicant standing, public and special interest.

Legislation

3. *Constitution Act 1902* (NSW)
4. *Crown Land Management Act 2016* (NSW)
5. *National Parks and Wildlife Act 1974* (NSW)
6. *Heritage Act 1977* (NSW)
7. *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (NSW)

Relief

8. Injunct the purported transfer of land title until the “traditional owners” of **Goat Island** is determined.
9. Criteria of injunctive relief¹:
 - a) Balance of convenience
 - i. 200 years of European settlement,
 - ii. 4 years of purported transfer of title,
 - iii. 1 month - 6 months of legal proceeding for declaratory relief.
 - b) Serious questions to be tried
 - i. Who are the “traditional owners” of the land?
 - ii. Is the transfer of ownership a “misappropriation” of property?

Submissions

10. Goat Island is for the White man.

¹ *Aquamore Credit Equity Pty Ltd v Pamada Pty Ltd (in liquidation)* [2021] NSWSC 1051 at [46]-[50]