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Submission Cover Sheet

Inquiry into DPA-04 – Missing Middle Housing Reform

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MMDR21 DPA-04 Feasibility Logic Gate Analysis

Forensic Feasibility Assessment: ACT Draft Plan Amendment 04 — The Feasibility Logic Gate

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SUBJECT: Forensic Interrogation of "Success Vectors" for ACT DPA-04

1.0 EXECUTIVE MANIFEST: THE STRATEGIC INTELLIGENCE PROTOCOL

1.1 The Operational Mandate

This report constitutes the formal execution of the Strategic Intelligence Protocol regarding the viability of the "Missing Middle" housing reforms in the Australian Capital Territory. The objective is singular and absolute: to isolate, quantify, and stress-test the specific conditions required to achieve SCENARIO A, defined as the state where a development proposal is both spatially possible and financially viable.

The analysis operates under the strict governance of the "Feasibility Logic Gate," a Boolean framework that rejects the optimism of high-level policy intent in favor of the binary truths of geometry and accountancy. In the realm of urban infill, a project does not exist on a spectrum of difficulty; it exists in a state of PASS or FAIL. A proposal that is 99% spatially compliant but fails to accommodate a heavy rigid vehicle turning circle is, for all functional purposes, 0% viable. Similarly, a project that generates an 18% return on cost in a market demanding a 20% risk premium is not "almost viable"; it is unbankable.

The Feasibility Logic Gate that combines two tests: HYPOTHESIS AREA and HYPOTHESIS RESULT. Should both be true the project is viable under DPA-04.

- HYPOTHESIS AREA or H(AREA) represents the spatial truth: The capacity of the land to physically contain the mandated infrastructure (driveways, waste trucks, deep soil zones) and a functional dwelling footprint.
- HYPOTHESIS RESULT or H(RESULT) represents the financial truth: The capacity of the project to generate a Residual Return (R_{actual}) that exceeds the risk-adjusted Cost of Capital (H), specifically the 20% hurdle rate required by Tier 2 lenders.

The Feasibility Logic Gate

$$\text{PROPOSAL VALID} = (\text{H}(\text{AREA}) = \text{TRUE}) \wedge (\text{H}(\text{RESULT}) = \text{TRUE})$$

or

$$\text{PROPOSAL VALID} = \text{H}(\text{AREA}) \wedge \text{H}(\text{RESULT})$$

The current landscape of DPA-04 implementation suggests a systemic failure rate for standard applications. The "Subtractive Constraints" of the Territory Plan—specifically the

interaction between Municipal Infrastructure Standards (MIS 07), the Waste Management Code, and the Lease Variation Charge (LVC)—frequently trigger a FALSE state in one or both inputs. This report rigorously excludes these zones of failure, identified herein as the "Feasibility Desert," to focus exclusively on the "Success Vectors."

These vectors—Consolidated Blocks, Rear-Laneway Typologies, and the High-Value/Low-LVC Intersections—represent the only theoretical pathways through the Logic Gate. This document provides the forensic evidence to substantiate their validity.

2.0 THE BOUNDARY CONDITION: SCOPE & EXCLUSION

To precisely define the vector of success, one must first ruthlessly delineate the boundaries of failure. The analysis begins by explicitly excluding the majority of the ACT's residential land supply from the viability pool. This exclusion is not based on zoning prohibitions—DPA-04 technically "allows" density in these areas—but on the immutable laws of spatial geometry and financial yield.

2.1 The Geometric Exclusion: The Standard RZ1 Block

The standard RZ1 Suburban block, typically measuring between 700m² and 800m² with a single street frontage, is mathematically incapable of supporting the density aspirations of DPA-04 when subjected to the full weight of technical compliance. While policy documents often illustrate "Missing Middle" housing with artistic renders of leafy townhouses, these images rarely account for the "Hard Infrastructure Subtraction" that governs actual site planning.

The primary mechanism of failure on the standard block is the "Forward Exit" mandate contained within Municipal Infrastructure Standard 07 (MIS 07). This standard dictates that for any development of two or more dwellings, vehicles must enter and exit the site in a forward direction. On a block with a standard 16-18 meter frontage, this requirement is catastrophic. To achieve a forward exit for a B85 design vehicle (the standard passenger car), the site plan must incorporate a turning bay or a T-head maneuver area.

Forensic analysis of the spatial impact reveals that the combination of a 3.0m to 5.5m driveway, the required clearances from street trees and infrastructure, and the internal turning apron consumes between 35% and 45% of the total site area. This "Hard Infrastructure" acts as a geometric sterilizer. It pushes the building footprints to the extreme peripheries of the block, creating the "Gun-Barrel" effect—a long, linear strip of paving running the length of the site, flanked by narrow, compromised dwellings.

Furthermore, the introduction of the "Soft Infrastructure" mandate—specifically the 20% Canopy Cover and Deep Soil Zones (DSZ)—creates a secondary layer of exclusion. These DSZs must have minimum dimensions of 5 meters by 5 meters and cannot overlap with the driveway or turning areas. On a standard block, the intersection of the driveway swept path and the deep soil zone leaves a residual buildable area (R_{area}) that is often insufficient for a functional second dwelling. The result is a spatial paradox where the "car" and the "tree" consume the space intended for the "house," triggering HYPOTHESIS AREA = FALSE.

2.2 The Financial Exclusion: The "Outer Ring" (Banks & Tuggeranong)

The second exclusion zone is geographic and financial. The "Outer Ring" suburbs, typified by Banks in the Tuggeranong Valley, represent a "Feasibility Desert." Here, the failure mechanism is not spatial, but economic.

The ACT construction market is currently defined by a "Bush Capital Premium." The intense competition for labor, driven by a historic pipeline of public infrastructure and defense projects, has established a high pricing floor for construction trades. The base rate for standard residential construction has stabilized at approximately \$2,950 per square meter. Crucially, this cost is inelastic; tradespeople do not discount their labor for projects in outer suburbs. In fact, travel allowances may arguably increase the cost base relative to central sites.

While the Cost of Construction (E) remains high and uniform across the Territory, the Revenue Ceiling (Z) drops precipitously as one moves away from the city center. In Banks, the market price for a new three-bedroom townhouse is capped at approximately \$760,000. When the fixed construction cost (E) and the statutory charges (LVC, Utilities, Infrastructure) are subtracted from this low revenue ceiling, the Residual Return (R_{actual}) collapses.

Forensic feasibility stacks for the Outer Ring consistently return a negative profit margin, often exceeding -15%. Even if the land were gifted to the developer for free, the construction and statutory costs alone would likely exceed the end sale value. Therefore, the Logic Gate for the Outer Ring is permanently locked at HYPOTHESIS RESULT = FALSE. These areas are categorically excluded from this analysis as viable vectors for private sector delivery.

2.3 The Policy Exclusion: Generic Intent

Finally, this report excludes any analysis of "generic policy intent." Planning reports often speak of "encouraging diversity" or "facilitating choice." In the context of a Feasibility Logic Gate, these terms are null values. A banker does not fund "intent"; they fund a debt-coverage ratio. A certifier does not approve "encouragement"; they approve a compliant swept path. Consequently, this investigation focuses solely on hard metrics: dimensions in meters, yields in square meters, and returns in dollars.

3.0 SYSTEMATIC COLLATION: THE METRICS OF VIABILITY

Having defined the boundary conditions, we now turn to the "Success Vectors." This section extracts and synthesizes the precise metric thresholds that trigger a TRUE state for the Logic Gate inputs.

3.1 Hypothesis AREA = TRUE (The Spatial Truth)

For the spatial hypothesis to return true, the site must possess sufficient geometric capacity to accommodate all mandatory subtractions without eroding the dwelling yield below the functional threshold.

3.1.1 The Consolidation Threshold: The Waste Management Nexus

The most significant barrier to achieving densities greater than two dwellings (i.e., true "Missing Middle" stock like tri-occupancies or townhouses) is the Waste Management Nexus. The Development Control Code for Best Practice Waste Management creates a "cliff edge" at the three-dwelling mark.

For developments of three or more units, if the kerbside frontage is insufficient to present bins (a common scenario given the density of driveways and street trees), the code mandates on-site collection. This triggers the requirement for a Heavy Rigid Vehicle (HRV) to enter the site, collect waste, and exit in a forward direction.

The geometry of an HRV is unforgiving. The vehicle is 12.5 meters long. Its turning circle, measured wall-to-wall, approaches 25.0 meters. To accommodate this movement, a site requires a massive internal maneuvering apron.

Forensic Calculation of the Threshold:

- Turning Circle Diameter: ~25.0 meters.
- Clearance Zones: +1.0 meter buffer on all sides.
- Total Width Required: Minimum 27-28 meters of unobstructed width at the turning point.
- Standard Block Width: 16-20 meters.

It is mathematically impossible to fit a 25-meter turning circle inside a 20-meter wide block. Therefore, the "Consolidation Threshold" is the absolute minimum area and dimension required to house this geometry.

Conclusion:

Analysis of successful spatial layouts indicates that a minimum site width of 30 meters is required to allow the HRV to enter, turn (using a T-head or circle), and exit while leaving space for building footprints on the periphery. This necessitates the consolidation of at least two standard RZ1 blocks.

- Standard Block: 800m² (20m frontage).
- Consolidated Block: 1,600m² (40m frontage).

The Metric: The Consolidation Threshold is 1,400m².

Any site smaller than 1,400m² (or with a frontage less than 28m) will physically fail the HRV swept path test for >2 dwellings, triggering HYPOTHESIS AREA = FALSE. The viability of tri-occupancies is strictly limited to these "Super-Lots."

3.1.2 Geometric Relief: The Rear Laneway Bonus

The "Rear Laneway" typology creates a distinct spatial loophole in the DPA-04 framework. By relocating vehicular access to a secondary service lane, the primary street frontage is liberated from the "Hard Infrastructure" of the driveway.

Quantification of the "Yield Bonus":

On a standard street-facing block, a 5.5m driveway crossover and its associated splay and clearances effectively sterilize a 6.5m to 7.0m strip of the frontage.

- Frontage Lost (Standard): ~7.0 meters.
- Frontage Regained (Laneway): ~7.0 meters.
- Area Metric: On a block with a 6-meter setback, removing the driveway reclaims approximately 42m² of prime, north-facing building zone.
- Deep Soil Efficiency: More critically, the removal of the longitudinal driveway (typically 30m long x 3.5m wide = 105m²) reclaims over 100m² of impervious hardstand.

This 100m² "bonus" can be immediately reallocated to the Deep Soil Zone (DSZ). Instead of a fragmented DSZ compromised by a driveway, the laneway block allows for a consolidated, contiguous green zone in the front yard. This satisfies the 20% Canopy Cover requirement without encroaching on the building footprint at the rear.

Target Suburbs:

This typology is not evenly distributed. It is a historical artifact of early Canberra planning, specifically the "Garden City" influences in the Inner North and select Woden pockets.

- Inner North: Downer, Dickson, O'Connor, Ainslie. These suburbs feature extensive networks of service laneways originally designed for "night soil" collection and utility access.
- Woden: Pearce, Torrens. Influenced by the Radburn principles or "Colonel Light Gardens" style layouts, these suburbs possess rear-access typologies that are now prime candidates for DPA-04 densification.
- Geometric Relief Status: In these suburbs, Hypothesis AREA = TRUE on unconsolidated 800m² blocks because the conflict between the car and the tree is structurally resolved.

3.1.3 The Basement Arbitrage: The Cost of Geometry

When horizontal geometry fails—when a block is too small to fit the house, the car, and the tree side-by-side—the only remaining spatial solution is verticality: the basement. Excavating the parking level clears the ground plane for Deep Soil compliance and living space, forcing Hypothesis AREA = TRUE. However, this triggers a massive financial penalty.

The Cost of Excavation:

Forensic analysis of MMDR20 data indicates a stark differential in construction rates.

- Standard Rate (Slab on Ground): \$2,950 per m².
- Basement Rate (High Spec): \$4,150 per m².
- The Delta: A premium of \$1,200 per m².

For a typical "Missing Middle" townhouse with a Gross Floor Area (GFA) of 180m², the basement premium adds approximately \$216,000 to the hard construction cost (*E*). To this,

one must add the risks of rock excavation and dewatering, often estimated at a provisional sum of \$50,000. The total "Basement Penalty" is conservatively \$250,000 per dwelling.

The Required Gross Realisation Value (Z):

To justify this additional \$250,000 cost while maintaining the mandatory 20% profit margin, the revenue ceiling must increase disproportionately.

- Calculation: $\text{Cost Increase} \times (1 + \text{Margin}) = \text{Required Revenue Increase}$.
- $\$250,000 \times 1.20 = \$300,000$.
- The end sale price of the unit must be at least \$300,000 higher than a comparable surface-parked unit.

The Threshold:

The "Basement Arbitrage" is only viable where the market supports a Gross Realisation Value (Z) of >\$1.6 Million per unit.

- Location: This restricts the basement solution almost exclusively to the Inner South (Griffith, Forrest, Red Hill) and premium pockets of the Inner North (Campbell, Reid).
- Conclusion: In Kaleen or Banks, where $\$Z < \1.0M , the basement solution is financially toxic. It solves the spatial problem but kills the financial result.

3.2 Hypothesis RESULT = TRUE (The Financial Truth)

The financial hypothesis requires that the Residual Return (R_{actual}) exceeds the Hurdle Rate (H). The primary lever for achieving this in the "Battleground" zones of the Middle Ring is the manipulation of the "Statutory Wedge," specifically the Lease Variation Charge (LVC).

3.2.1 The LVC "Sweet Spot": The Kaleen Arbitrage

The "Kaleen Arbitrage" identifies a specific regulatory anomaly where two physically identical blocks can have radically different statutory cost profiles based solely on the administrative wording of their Crown Leases.

The Schedule 1 "Gateway":

- Condition: Applies to Crown Leases that permit "residential purposes" generally but do not specify a maximum number of dwellings.
- Mechanism: The variation is to "specify" the number of units (e.g., for unit titling).
- Cost: A flat fee of \$46,000 per dwelling (indexed).
- Viability Impact: This is a predictable, low-cost entry point. For a tri-occupancy, the total LVC is \$138,000.

The Schedule 2 "Tax":

- Condition: Applies to Crown Leases that strictly limit the use to "single dwelling only."
- Mechanism: The variation is to "increase" the number of permitted dwellings.
- Cost: A valuation-based charge calculated on the "After Value" minus the "Before Value" with a 75% betterment tax applied. In high-value areas, or even middle-ring areas with high uplift potential, this charge can explode.

- Viability Impact: In Griffith, Schedule 2 charges can reach \$255,000 for the second dwelling.

The Arbitrage Potential:

In suburbs like Kaleen, Page, and Scullin (Middle Ring), there is a mix of lease types.

- Hypothesis: If a developer acquires a site eligible for Schedule 1, they save approx. \$100,000+ in statutory costs compared to a Schedule 2 site.
- The Land Acquisition Threshold (A): Even with the Schedule 1 advantage, the project is sensitive to land cost.
- Revenue (Z): ~\$965,000 (Kaleen Townhouse).
- Construction (E): ~\$413,000.
- Statutory (S): ~\$50,000 (Schedule 1 + Utils).
- Margin (20%): ~\$160,000.
- Residual Land Value (A): $Z - E - S - \text{Margin} \approx \$340,000$.

Conditions:

- This calculation reveals a crisis. The Residual Land Value for a single unit share is ~\$340k. For a tri-occupancy, the total supportable land value is ~\$1.02M.
- Market Reality: Unimproved blocks in Kaleen trade for \$1.1M+.
- Conclusion: The "Kaleen Arbitrage" only works if the Land Acquisition (A) is <\$1.1M. If the developer pays market premium (\$1.2M+), even Schedule 1 cannot save the project. The margin erodes to <15%.

3.2.2 The "Gold Plating" Threshold: Absorbing Schedule 2

In zones where Schedule 1 is unavailable (e.g., Griffith RZ2, where most leases are specific), the developer must absorb the punitive Schedule 2 LVC. To do this, they must "Gold Plate" the product—maximizing the specification to push the Revenue Ceiling (Z) as high as possible.

Calculating the Threshold:

- LVC Charge: ~\$422,500 (for 3 units).
- Land Cost: ~\$2,000,000.
- Construction (Basement): ~\$2,240,000.
- Total Cost (approx): \$4,660,000.
- Required Margin (20%): \$932,000.
- Total Gross Realisation Required: \$5,592,000.
- Per Unit Revenue: \$1,864,000.

The Metric:

The "Gold Plating" Threshold is a Net Realisation Value (Z_{net}) of \$1.7M+ (and the Gross ~\$1.9M).

Any project in a Schedule 2 zone that cannot command a sale price of nearly \$2 million per unit is unviable. This forces the market to abandon "affordable" or "mid-range" stock in

these areas entirely. The only viable product is the "Downsizer Mansion."

4.0 ENTITY & TYPOLOGY RESOLUTION: THE VIABILITY PROFILES

Based on the intersection of the spatial and financial metrics, we construct three distinct "Viability Profiles." These are theoretic archetypes that represent the only pathways to a PASS state in the Logic Gate.

4.1 Type A: The "Super-Lot" (Consolidated RZ1)

Definition: A consolidation of two adjacent standard RZ1 blocks in a Middle Ring suburb (e.g., Page, Scullin, or Kaleen).

- Site Area: 1,600m² (2 × 800m²).
- Frontage: 40m.
- Target Density: 5-6 Townhouses.

Logic Gate Analysis:

- Hypothesis AREA: **PASS**.
 - The 40m frontage allows for a centralized driveway with a dedicated internal T-head turning bay for the 12.5m HRV.
 - The "Waste Nexus" is resolved: the turning circle consumes ~25% of the site, leaving ample room for 5 dwellings and the 20% Deep Soil Zone (consolidated at the rear).
- Hypothesis RESULT: **CONDITIONAL PASS**.
 - Cost Driver: Acquisition of two blocks @ \$1.1M = \$2.2M.
 - Revenue: 6 units @ \$965k = \$5.79M.
 - LVC: Critical dependency. If the blocks are Schedule 1, LVC = \$46k x 6 = \$276k.
 - Margin: With Schedule 1, the project yields a ~18-20% margin. It is bankable.
 - Failure Condition: If the blocks trigger Schedule 2, the LVC could balloon to \$500k+, killing the margin.
- Verdict: VALID VECTOR provided LVC = Schedule 1.

4.2 Type B: The "Service Lane" Block (Inner North)

Definition: An unconsolidated 800m² block in Downer or Dickson with rear lane access.

- Site Area: 800m².
- Access: Rear Service Lane.
- Target Density: Dual or Tri-Occupancy.

Logic Gate Analysis:

- Hypothesis AREA: **PASS**.
 - Geometric Relief: The removal of the front driveway reclaims 42m² of buildable frontage and allows for a massive, compliant Deep Soil Zone in the front setback.
 - Waste: Kerbside collection is viable via the front street (using the reclaimed driveway space for bin presentation) or rear lane collection (if truck accessible).

The HRV on-site turn is not required if kerbside presentation space is adequate.

- Hypothesis RESULT: **PASS**.
 - Revenue: Inner North premiums ($Z \approx \$1.3M$) provide a healthy buffer.
 - Construction: Surface parking at the rear avoids the "Basement Penalty."
 - LVC: Even with Schedule 2, the high revenue (Z) helps absorb the cost, though Schedule 1 is preferred.
- Verdict: **VALID VECTOR**. This is the most robust typology in the DPA-04 framework. It resolves the "car vs. tree" conflict through historical geometry.

4.3 Type C: The "Builder-Developer" Hold

Definition: A standard 800m² block in Kaleen, owned by a small builder-developer for 10+ years.

- Site Area: 800m².
- Land Cost Basis: Historical (~\$600k).
- Entity Structure: Integrated Builder-Developer (No external build margin).

Logic Gate Analysis:

- Hypothesis AREA: **FAIL** (for Tri-Occupancy).
 - Even with the entity advantage, the block cannot physically fit the HRV turn for 3 units.
 - Constraint: The geometry limits this vector to Dual Occupancy (2 units) only.
- Hypothesis RESULT: **PASS** (for Dual Occupancy).
 - The "Builder" Advantage: Removing the 15% builder margin from Variable E saves approx. \$62,000 per unit (\$124k total).
 - The "Hold" Advantage: The low land basis drastically reduces Variable F (Finance Costs) and effectively eliminates the "Land Acquisition" hurdle.
 - Result: The project generates a "Super-Normal Profit" because the developer captures the margin on land uplift, construction, and development.
- Verdict: **VALID VECTOR** (Restricted). Valid only for Dual Occupancy. This confirms that for the true "Missing Middle" (3+ units), even the Builder-Developer model fails on a standard block due to spatial (HRV) constraints.

5.0 THE FEASIBILITY LOGIC MATRIX

The following matrix synthesizes the forensic analysis into a decisive output. It serves as the strategic lookup table for the DPA-04 implementation.

Viability Vector	Spatial Status (Hypothesis AREA)	Financial Status (Hypothesis RESULT)	"Golden Gate" Requirement (The TRUE Condition)
<i>Standard RZ1</i> (800m ²)	FAIL (Critical Dimension: 12.5m HRV Turn)	FAIL (Critical Driver: High Land + Const. Floor)	NONE (Systemic Failure - The "Feasibility Desert")

Viability Vector	Spatial Status (Hypothesis AREA)	Financial Status (Hypothesis RESULT)	"Golden Gate" Requirement (The TRUE Condition)
<i>Consolidated "Super-Lot"</i> (1600m ²)	PASS (HRV Turn fits in 30m+ width)	CONDITIONAL (Requires Schedule 1 LVC)	Yield $\geq$ 5 Units AND LVC Schedule 1
<i>Rear-Laneway</i> (Inner North)	PASS (Driveway removal = +42m ² Yield)	PASS (High Z / Low E / No Basement)	Existence of Service Lane + Inner North Z
<i>Kaleen Arbitrage</i> (Standard)	FAIL (Geometry limits to 2 units)	CONDITIONAL (Requires Schedule 1 LVC)	Schedule 1 LVC (\$46k) AND Dual Occ Only
<i>Inner South</i> (Griffith)	CONDITIONAL (Basement Required for Area)	CONDITIONAL (Requires "Gold Plating")	$Z_{gross} > \$1.8M$ AND Basement Build
<i>Builder-Developer</i> (Hold)	FAIL (for Tri-Occ) / PASS (Dual Occ)	PASS (Margin removal saves 15%)	Internal Construction Capability + Low Land Basis
<i>Outer Ring</i> (Banks)	PASS (If consolidated)	FAIL (Revenue < Construction Cost)	Subsidized Construction / Public Housing Only

6.0 DIALECTICAL SYNTHESIS & STRATEGIC RECOMMENDATIONS

6.1 The "Goldilocks" Filter: Market Distortion Effects

The rigid application of the Feasibility Logic Gate creates a severe distortion in the ACT housing market. Because viability is binary—a project is either valid or it is not—capital will not flow evenly across the Territory's RZ1 zones as policy intends. Instead, it will hyper-concentrate in the "Success Vectors."

The Laneway Premium:

We forecast a sharp decoupling of land values in suburbs like Downer and Dickson. Blocks with rear lane access, previously valued similarly to their neighbors, will attract a significant premium as developers identify them as the only "risk-free" spatial typology. The lane becomes a proxy for "development rights."

The Kaleen Scramble:

The "Schedule 1" arbitrage will trigger a forensic scouring of Crown Leases in the Middle Ring. Developers will prioritize acquiring sites with "undefined" leases to exploit the \$100k LVC saving. This may lead to a two-tier market where adjacent blocks trade at vastly different prices based solely on a 50-year-old administrative clause.

6.2 The Second-Order Insight: The Green-Infrastructure Conflict

A critical second-order insight derived from the collation of MMDR20 and MMDR07 is the dialectical tension between Decarbonisation and Densification.

The ACT's 2025 Gas Ban mandates full electrification for new dwellings. This forces high-load appliances—induction cooktops, heat pumps, and EV chargers—onto the grid. For a tri-occupancy, this electrical load frequently breaches the 100 Amp per phase threshold set by EvoEnergy.

- The Consequence: Crossing this threshold triggers "Shared Network Augmentation" charges. A developer may be forced to pay \$15,000+ for grid upgrades or even fund a new pad-mounted substation.
- The Conflict: Simultaneously, the "Living Infrastructure" (Canopy) rules force trees into the buildable area.
- The Result: The developer is squeezed from both sides. The "Green" mandates (Trees + Electrification) impose costs and spatial constraints that actively cannibalize the "Housing" mandate. The Logic Gate suggests that without a relaxation of one (e.g., subsidizing grid augmentation), the "Missing Middle" will remain a theoretical concept for many projects.

6.3 Recommendation: Unlocking the Gate

To expand Scenario A beyond the narrow vectors identified, the Logic Gate suggests one high-leverage intervention that does not require massive financial subsidy: Decoupling the Waste Code.

If the ACT Government were to mandate Kerbside Collection for developments up to 4 dwellings—removing the on-site HRV requirement—the "Spatial Failure" for standard blocks would instantly resolve.

- Impact: The 25m turning circle would no longer be required. The "Builder-Developer" (Type C) could then deliver Tri-Occupancies on standard blocks, tripling the potential yield of the Middle Ring.
- Strategic Value: This is a zero-cost policy change that unlocks hundreds of hectares of RZ1 land currently trapped in the "Geometry of Failure."

FINAL STATUS REPORT

SCENARIO A is currently achievable ONLY via Consolidation, Rear Lanes, or Schedule 1 LVC Arbitrage. All other vectors return FALSE.

END