



**Promoting opportunities. Protecting rights. For older Victorians.**

## **COTA Victoria & Seniors Rights Victoria**

### ***Submission to City of Melbourne's Community Infrastructure Plan***

**To:**

City of Melbourne

Via: [participate.melbourne.vic.gov.au/community-infrastructure-plan](https://participate.melbourne.vic.gov.au/community-infrastructure-plan)

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## 1 About us

[Council on the Ageing \(COTA\) Victoria](#) is the leading not-for-profit organisation representing the interests and rights of people aged over 50 in Victoria. Celebrating 75 years of service in 2026, we have led government, corporate and community thinking about the positive aspects of ageing in the state.

Today, our focus is on promoting opportunities for and protecting the rights of people 50+. We value ageing and embrace its opportunities for personal growth, contribution, and self-expression. This belief brings benefits to the nation and its states alongside communities, families, and individuals.

[Seniors Rights Victoria \(SRV\)](#) is the key state-wide service dedicated to advancing the rights of older people and the early intervention into, or prevention of, elder abuse in our community. It is the only Community Legal Centre dedicated to preventing and responding to elder abuse within Victoria.

SRV has a team of experienced advocates, lawyers, and social workers who provide free information, advice, referral, legal advice, legal casework, and support to older people who are either at risk of or are experiencing elder abuse. SRV supports and empowers older people through the provision of legal advice directly to the older person.

## 2 About this submission

COTA Victoria appreciates the opportunity to contribute to this consultation and acknowledges the City of Melbourne's commitment to meaningful community engagement throughout this process. COTA Victoria commends the current draft Community Infrastructure Plan; the feedback provided through this submission is intended to strengthen the Plan rather than reframe it.

This work is of particular significance to older people. The physical, local, and communal environments in which people live play a critical role in supporting positive ageing, and the draft Plan presents a significant opportunity to enable this across Melbourne City.

COTA Victoria has worked closely with the Municipal Association of Victoria in their development of *Age-friendly Cities and Communities: Information Kit for Local Government Councillors and Senior Management*; designed to provide councils with the knowledge and practical tools needed to build and progress age-friendly communities. This submission draws on this document in providing feedback on the current draft Plan.

### 3 Overview of feedback

People are living longer, and Victoria’s population is ageing, resulting in a growing number of older people and a shift in the demographic profile of communities. This change has important implications for how cities are planned, designed, and governed, particularly at the local government level where decisions about the built and social environment are most directly felt.

The draft Community Infrastructure Plan is a strong and well-considered strategic document that presents an opportunity facilitate inclusive, and connected, urban design and service delivery. We commend its commitment to equity, inclusion, and access across the life course is a positive step. By explicitly positioning community infrastructure as something that should support people “at every stage of life”, ageing is not treated as a standalone or marginal issue which is critical in developing sustainable, age-friendly communities.

We are also glad to see the inclusion of “space for older people” and the promotion of community hubs as a primary delivery model supports integrated, place-based access to services and facilities, consistent with established age-friendly best practice. Finally, the Plan’s use of an evidence-driven needs assessment, and regular review cycles provides a strong foundation for responsive and accountable implementation over time.

This submission does not seek to redirect the intent or substance of the draft Plan, but to strengthen its impact. Age-friendly cities deliver the greatest dividends when principles are made explicit, accountability mechanisms are clear, and older people are actively engaged as contributors to community life. While the draft Plan aligns with these principles, this alignment is largely implicit. COTA Victoria’s recommendations to strengthen the current draft Plan include:

- 1) Making age-friendliness explicit, including by referencing recognised frameworks and legislative obligations.
- 2) Embedding ongoing participation and co-design with older people.
- 3) Strengthening visibility, access and inclusion for those most at risk of exclusion, including older people who are digitally excluded or socially isolated.

### 4 Ensuring an age-friendly approach

COTA Victoria supports the direction of the Plan, including its community infrastructure principles and priorities for the next four years. However, there are opportunities to strengthen its ability to enable an increasingly age-friendly city. Internationally, the policy context for urban development has increasingly emphasised the role of age-friendly environments. The WHO’s *World Report on Ageing and Health (2015)* and the *Framework for Action on Ageing and Health (2016)* reframed healthy ageing as a whole-of-system issue, identifying age-friendly environments as a global priority.

By developing a Community Infrastructure Plan that actively reflects positive ageing

principles and service design, alongside existing age-friendly commitments, City of Melbourne will continue to be a leader in the space of positive ageing in Victoria.

At an individual level, age-friendly cities support improved health and wellbeing, greater independence, and stronger social connection as people age. Economically, age-friendly approaches contribute to the sustainability of local businesses, higher levels of volunteering and workforce participation, and can reduce pressure on health and support services. At a community level, they help build social capital, strengthen civic participation, and contribute to safer, more connected communities overall.

## 5 Melbourne City's role and responsibility within this work

Globally, local government is recognised as central to developing age-friendly cities and communities. In Victoria, this role is reinforced through the Age-friendly Victoria Declaration. Councils have a unique ability to integrate social and built environment planning, work across life stages and service systems, and align policy, infrastructure, services, and partnerships at a local level.

Under the *Local Government Act*, councils are required to foster community cohesion, encourage active participation in civic life, and promote long-term social, economic, and environmental wellbeing. Additionally, the *Australian Human Rights Commission Act* and *Victorian Charter of Human Rights and Responsibilities Act* requires local government to consider human rights in policy development, service delivery and decision-making.

Further to the City of Melbourne's responsibility to an ageing population, the *Age Discrimination Act* prohibits less favourable treatment on the basis of age while the *Disability Discrimination Act* affirms the right of people with disability to access public places and participate fully in community life. An age-friendly approach supports these obligations by embedding ageing considerations across all areas city planning.

The Plan implicitly acknowledges the City of Melbourne's position as a leader among Victorian councils, noting that it is "the urban, cultural and commercial centre of Victoria". This position gives the City of Melbourne influence not only over its own residents, but across Greater Melbourne, Victoria more broadly, and the wider policy landscape. In this context, we encourage the Plan to consider how its approach to responsibilities and implementation will shape governance culture and practice across other councils.

## 6 Recommendations to strengthen the Community Infrastructure Plan

Our recommendations to strengthen the draft focus on improving clarity and ensuring age-friendly principles are properly embedded in line with the City of Melbourne's commitment to the Age-friendly Victoria Declaration.

### **Recommendation 1: Making age-friendliness explicit**

While the draft Community Infrastructure Plan demonstrates alignment with some age-friendly principles, this alignment is largely implicit. We recommend that the Plan:

- explicitly reference Melbourne City’s endorsement of the *Age-friendly Victoria declaration*, and the *WHO Age-friendly Cities and Communities framework* to anchor the Plan to a recognised, evidence-based reference point for implementation.

Making age-friendliness explicit would not require a shift in intent or direction. Rather, it would provide clarity, consistency and a shared reference point for how ageing considerations are to be embedded across planning, delivery and evaluation.

### **Recommendation 2: Participation, co-design, and ongoing engagement with older people**

Engagement and co-design with older people should be continuous rather than one-off and embedded within governance and implementation. The draft Plan references extensive community and stakeholder engagement under section 1.4.3; however, the bodies and mechanisms identified do not include targeted consultation with older people. There is an opportunity to address this by:

- embedding mechanisms for ongoing engagement with older people throughout implementation and review; and,
- ensuring engagement is continuous, appropriately resourced and embedded within delivery processes, including evaluation and reporting.

### **Recommendation 3: Visibility, access, and inclusion for those most at risk of exclusion**

Aspects of the Plan aim to improve how people discover and use community spaces, including better signage, naming and online information. However, these themes may not prove effective for some older people, for example those digitally excluded. We suggest improving infrastructure access and awareness further by considering how to improve awareness and access for those who are at heightened risk of exclusion. Specifically:

- Strengthen the Plan by explicitly addressing how awareness and access to community spaces will be supported for people who are at heightened risk of exclusion, including those who are digitally excluded, lack mobility, are socially isolated or may require direct outreach.

### **Recommendation 4: Provide facilities to support adult education (section 4.2)**

Provide facilities to promote ongoing learning and forward planning for Victorians as they age. This could include facilities that support education session relating to topics such as, but not limited to, financial literacy, planning for retirement, and digital engagement.

## 7 Conclusion

The draft Community Infrastructure Plan provides a strong foundation for supporting inclusive, connected and liveable communities across the City of Melbourne. Its emphasis on equity, access and participation across the life course aligns closely with age-friendly principles and reflects a genuine commitment to supporting people at every stage of life.

By explicitly anchoring the Plan to recognised age-friendly frameworks and legislative obligations, embedding ongoing engagement with older people, ensuring visibility and integration within mainstream community infrastructure, and addressing barriers faced by those most at risk of exclusion, the City of Melbourne can further strengthen the Plan.

These refinements would strengthen the Plan's clarity, consistency and accountability, ensuring the positive foundations already present translate into sustained, age-friendly outcomes in practice, benefiting older people, the wider community, and city as a whole.