

Communications and Engagement Plan

NEW HARINGEY LOCAL PLAN



Communications and Engagement Plan (September 2020) – New Haringey Local Plan

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A) Purpose

Haringey's Local Development Scheme (LDS) sets out the timetable for preparation and review of the Council's planning policy documents. The LDS identifies a need for a full review of the existing adopted Local Plan documents, commencing in 2020.

A New Local Plan is required to:

- A. Deliver on the priorities set out in the Borough Plan, which include delivery of a New Local Plan
- B. Respond to Haringey's Declaration of a Climate Emergency
- C. Take into account changes to national policy, in particular, the introduction of the National Planning Policy Framework 2019
- D. Be in general conformity with New London Plan
- E. Respond to housing delivery challenges
- F. Support recovery and renewal from Covid-19

In preparing a new Local Plan the Council will ensure that it engages effectively with its residents and businesses to achieve Outcome 17 of the Borough Plan.

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B) Responsible Cabinet Member and Officers

Responsible Cabinet Member	Councillor Hearn	Cabinet Member for Climate Change & Sustainability
Responsible Manager	Rob Krzyszowski	Interim Assistant Director for Planning, Building Standards and Sustainability
Responsible Team Lead	Bryce Tudball	Planning Policy Team Manager
Responsible Officer	Timothy Solomon	Principal Planner

C) Policy Context

Legislation

The process for preparing a Local Plan is set out in the **Town and Country Planning (Local Planning) (England) Regulations 2012**. At least two rounds of consultation are required prior to submission of a Local Plan for examination.

Regulation 18 requires the local planning authority to notify the following groups and invite them to make representations on what the local plan should contain:

- Specific consultation bodies as the local planning authority consider may have an interest in the subject of the new Local Plan;
- General consultation bodies as the local planning authority consider appropriate; and
- Residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations

The Council will undertake two consultations under Regulation 18, with the first stage being the 'First Steps' engagement. This will provide the community with an early opportunity to help shape the direction of the New Local Plan.

In addition, under **Regulation 19**, before submitting a local plan for examination the local planning authority must make a copy of the proposed submission documents (including the draft plan) available for the public to make representations on.

During the local plan examination, major modifications arising out of the examination process may also need to be consulted on.

Section 33A of the Planning and Compulsory Purchase Act 2004 makes clear that the Council is under a 'Duty to Co-operate' with its neighbouring boroughs, the GLA and other prescribed bodies or persons in preparing its New Local Plan, as far as it relates to a strategic matter. The prescribed bodies are set out in **Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012**.

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To support the preparation of the Local Plan the Council is required to prepare an Integrated Impact Assessment (IIA).

The IIA is designed to ensure that through the development of the Local Plan the effects of its policies, need for any mitigation and reasonable alternatives are adequately considered so that the decision-making process is an informed one. It is comprised of three different assessments:

- A **Sustainability Appraisal** – A systemic process required under the Planning and Compulsory Purchase Act 2004 and by EU Directive that is carried out during the preparation of the Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives when judged against reasonable alternatives.
- An **Equalities Impact Assessment** – Aims to ensure that through preparation of the Local Plan the Council is complying with its duty as set out in the Equality Act 2010 to eliminate unlawful discrimination in carrying out its functions, promote equality of opportunity between different genders, racial groups and other equality groups and foster good relations between people who shared a protected characteristic and those who do not share it. Although low income groups are not identified within the 'Protected Characteristics', they will be considered as part of this assessment as low income and deprivation typically overlap with other equalities characteristics.
- A **Health Impact Assessment** – Helps ensure the plan promotes health gains for the local population, reduces inequality and avoids activity damaging health. Not a statutory requirement but is good practice.

The assessment also takes into account the responsibilities placed on local authorities by **Section 17 of the Crime and Disorder Act 1998** to do all that they reasonably can to prevent crime and disorder.

The Council is expected to consult the consultation bodies identified in the **Environmental Assessment of Plans and Programmes Regulation 2004** when defining the scope of the sustainability appraisal. It will also need to seek representations from consultation bodies and the public on the sustainability appraisal report (incorporated in the IIA report) prior to submitting these documents for examination alongside the draft Local Plan.

National Policy

The **National Planning Policy Framework 2019** states that plans should be:

- Shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; and
- Be accessible through the use of digital tools to assist public involvement and policy presentation.

Further guidance is provided in **National Planning Practice Guidance** on Plan-Making.

Haringey Policy

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The Council's [Consultation Charter](#) emphasises the fundamental importance of consultation sets out how the Council seeks to consult with people in Haringey. It includes a number of practical goals including:

- Whenever possible, co-ordinating our consultation programme with other organisations that consult people living and working in Haringey.
- Monitoring our consultations to avoid duplication and repetition.
- Clearly communicating the purpose of the consultation, who is being consulting, how people are being consulted, when decisions will be taken and what happens next.
- Using Plain English and translating documents into other languages and formats (e.g. Braille) and providing interpreters at meetings when they are needed.
- Including enough information about consultation to enable people to make an informed contribution.
- Following good practice and legal requirements that relate to equality and social inclusion.

The Council's [Statement of Community Involvement \(SCI\)](#) sets out how the planning service will engage with the community by ensuring that consultation is: *Effective, Transparent, Proportional, Inclusive, Accountable and Coherent*. The SCI is being reviewed in 2020 to adapt it to social distancing requirements for Covid-19.

D) Consultation Phases

In addition to the statutory consultation requirements under Regulation 18 and 19, the Council will undertake an initial 'First Steps' phase of consultation to ensure early engagement and to meet statutory requirements of Sustainability Appraisal. The phases of consultation, their purpose and timeframe are outlined below.

Phase	Purpose	Timeframe	Length
First Steps (Pre Regulation 18)	<i>The first opportunity for residents, businesses and other local stakeholders to help shape the new Local Plan from the beginning, identifying key issues the Borough faces and preferences for various possible options.</i>	Autumn 2020	Minimum 8 Weeks
Draft Local Plan (Regulation 18)	<i>The Council will consult on a full draft of the Local Plan to consider refined options before the final version is published.</i>	2021	Minimum 6 weeks
Proposed Submission Local Plan (Regulation	<i>The Council will publish the Local Plan which is followed by a minimum 6 week period of</i>	2021	Minimum 6 weeks

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19)	<i>consultation where formal representations can be made to it.</i>		
Submission and Examination (Regulations 22-25)	<i>The Council will submit the Local Plan to the Secretary of State via the Planning Inspectorate. A Planning Inspector will examine the document to check for compliance with the legislation and tests of soundness. The Council may need to consult on the Proposed Modifications.</i>	2021/22	TBD
Adoption (Regulation 26)	<i>The Council will adopt the Local Plan following consideration of the Inspector's recommendations.</i>	2022	TBD

E) Characteristics of the Borough

The [State of the Borough Profile](#) provides Haringey's stakeholders with access to data to understand the unique characteristics of the borough. The most recent profile was published in July 2020. Key findings include the following:

- Haringey has a **young population**.
 - Children between 0-17 years comprise 21% of the population.
 - Young adults (18-34) make up the largest proportion of residents (27%).¹
 - The older age groups (65+) are expected to experience the largest percentage group by 2028, however, will still only comprise 12% of the total population by then.
- Haringey has an ethnically **diverse population**.
 - 38% of residents belong to Black, Asian and minority ethnic groups. 26% identify as ethnically white other than British.
- **Numerous languages** are spoken in Haringey.
 - 180+ languages are spoken in the borough.
 - 30% of residents do not speak English as their main language. Of those, 24% do not speak it well or at all.
- Haringey has the **9th largest proportion of LGBT residents** (4%) of all local authorities. 25% of all homeless youth are LGBT.
- **10% of the population between 16 and 64 have a physical disability**.
 - Almost 5,000 people have sight loss which impacts on daily living and 15,700 have a moderate or severe hearing impairment.
- The proportion of residents that are renting from the local authority or housing association (20%) or privately renting (34%) has increased since 2011 while home ownership has dropped.
- **Deprivations levels are high**, particularly in the northeast of the borough.

¹ GLA SHLAA (2016) Population Estimates for 2018

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- 3,000 households (25 per 1,000) are living in temporary accommodation. This is the third highest rate in London.
- Haringey has a **diverse household composition**.
 - 16% are workless households, 49% working households and 36% mixed households.
 - 32% are one person households, 16% couples with dependent kids and 11% are households with a lone parent and dependent children.
- **Job density in the borough is low.**
 - The borough's population decreases by about 16% during the workday, indicating that residents leave the borough for work.
 - There are 2,700 creative and cultural industry (CCI) enterprises in Haringey, which are estimated to employ over 5,220 people.
- **Haringey has good facilities, with a range of cultural events, sporting venues and transport links**
 - There are over 120 venues where cultural activity takes places and over 70 events occurring annually from community theatre to large scale music events.
 - There are clear clusters around Alexandra and Finsbury Parks, Noel Park, Crouch End and Tottenham Green, but cultural venues are well spread across the borough.
 - Haringey is also home to the Tottenham Hotspur Stadium, a world-class multi-use stadium capable of staging major sporting and non-sporting events.

F) Previous Consultations

It is important to review previous consultations to avoid duplication, repetition and ensure we are making full use of the information our stakeholders provide us with.

In early 2018, Haringey Council commissioned market research company BMG Research to conduct a survey of Haringey residents to understand more about their lives, attitudes, and feelings about their local areas. BMG Research conducted 1,900 face-to-face interviews with a representative sample of residents from across the borough. Key findings from this survey include the following:

- Work or commuting advantages were the most commonly mentioned single reason for moving to Haringey (30%). A total of 45% of recent arrivals gave housing related responses (i.e. housing was affordable, the type of housing met my needs or was offered housing here).
- Work and housing (availability and affordability) as well as being key reasons for in-bound population movements also are key reasons for individuals being likely to move away from the borough.
- Those who have lived in Haringey for longer are more likely to state that they will still be living in here in 5 years' time.
- Couples with children are 2.5 times more likely to state that they will be living in the area in the next 5 years compared with single people with no children.
- When asked in an open response question what makes the biggest difference to quality of life on a day to day basis, safety and security issues were most commonly mentioned (13%), followed by cleanliness, health/wellbeing, access to open spaces and family and friends. Transport/ traffic was 7%, area/location/place (6%), noise levels (6%), housing (3%) and parking (2%).

Other documents that have been recently consulted on include:

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- The Air Quality Action Plan 2019-2024
- Parking Consultations 2019
- Affordable Energy Strategy 2020-2025
- Budget Consultation 2020-21
- Affordable Energy 2020-2025

In addition, the Wood Green Area Action Plan Regulation 18 Preferred Option Consultation was undertaken in 2018. The resulting consultation report provides an indication of which demographics require specific targeting, although it should be noted that this consultation was area focused rather than borough-wide.

- **Children and Young People** were **significantly underrepresented**. 0-15-year olds provided 1% of responses when 0-17-year olds are 22% of the total borough population.
- **Young Adults (25-34-year olds)** were **underrepresented**, providing 17% of responses and comprising 29% of the population.
- **BAME** groups were underrepresented. They provided 21% of the responses compared with 38% of the population
- **'White-Other'** groups appear to have been underrepresented. They comprise 26% of the population.

G) Objective and Strategies

The **overall objective** is to achieve effective, representative engagement with the public and key stakeholders to:

- A) Inform development of the Local Plan
- B) Provide the public with opportunities to influence the decisions that will affect them
- C) Ensure the Council complies with its statutory requirements as well as its own aspirations for consultation

To achieve this objective, we will employ the following strategies:

Strategy	Method
1 Clear, concise, accessible, and engaging messaging	A. Consistent branding. B. Use of plain English, short easy to read documents in an accessible format. C. Clear focal point of information provision – website. D. Use infographics and videos to engage audience. E. Clearly state the purpose of consultation, who it is for, when decisions will be taken and what happens next.
2 Long term focus on building relationships with key stakeholders	A. Clear tracking of responses through the different stages of consultation. B. Timely responses to consultation feedback. C. Establish clear points of communication and work with wider Council to ensure established relationships with key stakeholders are used where appropriate. D. Acknowledge what our communities have

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		already said through previous consultations.
3	Achieve a representative response	<p>A. Use of the representative Citizens Panel</p> <p>Develop new approaches to target groups that we may not be reaching through traditional consultation methods:</p> <ul style="list-style-type: none"> B. Young people C. LGBTQ+ D. Disabled people E. BAME F. People with language barriers G. Gypsies and Travellers H. Groups who may have limited internet access or familiarity I. Areas of higher deprivation and anticipated growth <p>Work with other Council departments to ensure the views of local businesses are obtained.</p> <ul style="list-style-type: none"> J. Small businesses K. Complete Equalities Impact Assessment L. Ensure people know how all information is managed, used and stored in accordance with the Data Protection Act 2018. M. Compile demographic information from responses.
4	Work collaboratively across the Council and across the community	<ul style="list-style-type: none"> A. Ensure consultations are co-ordinated with others across the Council. B. Work with relevant Council teams to develop consultation material and ensure clear and consistent messaging across the Council. C. Make use of existing Council facilities and community events where appropriate. D. Engage collaboratively with community groups and organisations to distribute messaging to their members and contacts.
5.	Achieve efficient consultation	<ul style="list-style-type: none"> A. Set out what can and cannot be achieved through the Local Plan. B. Provide enough information about the consultation and subject areas to ensure people can make an informed decision. C. Use consultation as an opportunity to promote existing guidance material where appropriate. D. Collect information on the perceived quality of the engagement exercise.
6.	Use digital tools to assist public involvement and policy presentation	<ul style="list-style-type: none"> A. Focus consultation on an accessible and engaging main webpage. B. Investigate opportunities to use digital tools improve accessibility, attractiveness, and ease of consultation. C. Make use of social media platforms.

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H) Phase 1 Consultation: First Steps

Phase 1 Consultation: 'First Steps' is the first opportunity for residents, businesses and other local stakeholders to help shape the new Local Plan from the beginning, identifying key issues the Borough faces and preferences for various possible options.

The **Key Messages** for this Phase are:

- Help shape the future growth of your borough
- We know that the Covid-19 pandemic has had a big impact on people in the borough and it is a difficult time, the New Local Plan will support the borough's recovery, and we want to help and support people to be engaged in the New Local Plan
- The Local Plan will set out London Borough of Haringey's policies towards housing, climate change, town centres, open space, employment, community facilities, the built and natural environment and transport – all of which contribute to making Haringey a vibrant place to live, work and play.
- Have your say on **TBD**
- The consultation ends on **TBD**

The quantitative **target** for this Phase is 1000 representations

Event/channel (Optional)	Description
Local Plan Website	A dedicated Local Plan webpage is set up on the Council website or externally and linked to the Council webpage to provide a clear, engaging and flexible platform to be a focal point for engagement
Branding	Develop distinctive Local Plan branding within the Haringey branding requirements
Council Website	Full information on the dedicated page of the website. Plus use of homepage web banner 'carousel'.
Videos	Short video on the Local Plan Website encouraging everyone to get involved. To be shared on social media platforms, internal Haringey website.
Infographics	To include on the document, webpage, questionnaire, social media and any physical consultation materials
Online consultation questionnaire	Posted on Council consultation portal and optimised for mobile devices. Word version also available for those who can't use the online questionnaire
Online consultation questionnaire – Kids Edition	A simplified, more visual interactive questionnaire for kids. This could be used by schools as part of their online education.

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Event/channel (Optional)	Description
Live Chat/ Webinar	The Council could run webinar 'live chat' sessions (less than 45 min) through the Local Plan Website.
Agents Forum	The Planning Service occasionally holds an Agents' Forum with the planning consultants / developers / architects that regularly submit planning applications to discuss service improvements and planning policy
Quality Review Panel (QRP)	QRP is a panel of design experts that review planning applications. The QRP could review the Plan as a whole or review certain elements such as the Design policies, and/or Regeneration Area chapters. May not be appropriate for First Steps but for Regulation 18 Draft Plan stage
Voluntary and Community Sector (VCS) Networks e.g. Bridge Renewal Trust , Selby Trust , etc. Equally consider the Climate Forum, Neighbourhood Forums, CAACs etc.	Use networks to promote / run events with.
Virtual Exhibition	Corporately the Council is considering options for 'virtual exhibitions'.
Social media	Create simple 3-5 image infographics to communicate the Local Plan process and key topics in a quick and engaging way. These are to be used on all social media platforms Use of Council Facebook Instagram and Twitter to disseminate encouragements and reminders to participate in consultation survey and events using #HaveYourSayHaringey (TBC) or an alternative hashtag. Promoting posting on other non-Council community social media pages
	Use social media – quick polls for key local plan questions to encourage people who are time-poor to provide feedback. There should also be the opportunity to link to the Local Plan Webpage and full questionnaire
	Encourage discussion and debate on social media platforms – consider include short videos from community groups to encourage involvement
Digital Advertising	Advertise the engagement online to people that interact with our council webpages and other affiliated or local pages
Clear Channel	Advertise on digital panels in the borough
Citizens Panel	Send out online Questionnaire/ Link to Local Plan Website to entire Citizens Panel.
Media Relations	Press release News stories linked to all milestones including general reminders to participate in the consultation.

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Event/channel (Optional)	Description
	Reactive PR support for media enquiries throughout consultation. Haringey People and Haringey People Extra– Homes Zone (HfH) Tottenham Website and Tottenham Community Press
Email campaign	Website/ questionnaire link sent directly by email to Local Plan Consultation Database as supplemented by research on relevant public groups/ organisations
Planning Communications	Include a brief note on the consultation and a link to the email signatures of planning service.
Internal	Regular internal news updates and progress reporting
Posters/ boards to be created	Visual posters or display boards created – posing short thought-provoking questions and containing information on how to engage These could be placed at the following locations: <ul style="list-style-type: none"> - Supermarkets - Entrance to parks - Libraries and other public facilities - Connected Communities Hubs - Lampposts (next to the above locations and at town centres)
Children and Young People	Provide information on Haringey Youth Space, through Haringey Gold
	Online consultation questionnaire – Kids Edition: A simplified, more visual interactive questionnaire for kids. May include a quiz at the end to cement learning. This could be used by schools as part of their online education.
	Marketing via school bulletins
	Empowering Youth Advisory Board to engage their peers – work with them to approve/ create consultation content
LGBTQ+ (in particular young people)	Discuss other options with Council's LGBTQ+ Network and local, regional and national groups like Wise Thoughts, Embrace UK and LGBTQ+ Youth Group, PlanningOut and Stonewall.
Disabled People	Work with Web Team to ensure that the website at a minimum meets level AA of the Web Content Accessibility Guidelines (WCAG 2.1) Talk to Wood Green Regeneration Team who worked with local disability groups as part of the Design Guide. Look at opportunities to provide audio content/ transcripts alongside PowerPoint style information presentations. Engage directly with community groups representing those with disabilities to co-develop/ test materials.
People with language	Look at options for translating website material

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Event/channel (Optional)	Description
barriers	
	Focus on making the Plan as visual and easy to read as possible
BAME	Engage with BAME community groups, organisations and the LBH BAME network. Look at opportunities to advertise in non-english media
Religious Groups	Work with religious leaders to provide consultation materials to their congregations. Engage with Council faith groups.
Gypsies and Travellers	Work with local community liaison and London Policy Officer to identify engagement approach
Groups who may have limited internet access/ familiarity	Work with Older Persons and Housing Services as well as older persons representative groups to identify best mechanism to communicate
	Put up display boards at libraries and Connected Communities hubs. Provide options to print out summary document and questionnaire as well as provide feedback at these locations
	Consider options of a borough wide mail out advertising the consultations
	Consider opportunity to undertake Vox Pop style interview, particularly in areas of higher anticipated growth such as Tottenham and Wood Green. This could be led by local councillors
Areas of higher deprivation and anticipated growth	Include a leaflet with information on how to engage (online and offline options) to those receiving food through connected communities Focus poster distribution in areas of anticipated growth and deprivation. Distribute posters on Council estate information boards.
Businesses	Work with the EDS team to develop an approach to engaging with businesses, including the Wood Green BID. Promote through the Business Bulletin.

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I) Scoring/Evaluation

Have we implemented the strategies?

Strategy	Method	Achieved (Y/N)
1	Clear, concise, accessible and engaging messaging	A. Consistent branding
		B. Use of plain English, short easy to read and accessible documents
		C. Clear focal point of information provision - website
		D. Use infographics and videos to engage audience
		E. Clearly state the purpose of consultation, who it is for, when decisions will be taken and what happens next
2	Long term focus on building relationships with key stakeholders	A. Clear tracking of responses through the different stages of consultation
		B. Timely responses to consultation feedback
		C. Establish clear points of communication and work with wider Council to ensure established relationships with key stakeholders are used where appropriate.
		D. Acknowledge what our communities have already said through previous consultations.
3	Achieve a representative response	N. Use of the representative Citizens Panel
		Develop approaches to target groups that may not respond to traditional consultation methods:
		A. Young people
		B. LGBTQ+
		C. Disabled people
		D. BAME
		E. People with language barriers
		F. Gypsies and Travellers
		G. Groups who may have limited internet access/ familiarity

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		H. Areas of higher deprivation and anticipated growth	
		Work with other Council departments to ensure the views of local businesses are obtained. I. Small businesses	
		J. Complete Equalities Impact Assessment	
		K. Ensure people know how all information is managed, used and stored in accordance with the Data Protection Act 1998.	
		L. Compile demographic information from responses	
4	Work collaboratively across the Council and across the community	A. Ensure consultations are co-ordinated with others across the Council	
		B. Work with relevant Council teams to develop consultation material and ensure clear and consistent messaging across the Council	
		C. Make use of existing Council facilities and community events where appropriate	
		D. Engage collaboratively with community groups and organisations to distribute messaging to their members and contacts.	
5.	Achieve efficient consultation	A. Set out what can and cannot be achieved through the Local Plan	
		B. Provide enough information about the consultation and subject areas to ensure people can make an informed decision	
		C. Use consultation as an opportunity to promote existing guidance material where appropriate	
		D. Collect information on the perceived quality of the engagement exercise	
6.	Use digital tools to assist public involvement and policy presentation	A. Focus consultation on accessible and engaging main webpage.	
		B. Investigate opportunities to use digital tools improve accessibility, attractiveness and ease of consultation.	
		C. Make use of social media platforms.	

Measurable Targets for Phase 1

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- 1000 unique representations
- 80% satisfaction with the quality of engagement
- 3000 unique visitors to the Local Plan Webpage
- Reach and engagement of social media posts
- Amount of media coverage throughout consultations

J) Equalities Impacts

The New Local Plan has the potential to result in negative impacts on individuals and groups with protected characteristics as well advance equality through its policies. The Integrated Impact Assessment Scoping Report sets out the equalities issues related to each New Local Plan topic area and identifies key considerations for policy development to ensure potential negative impacts are mitigated and opportunities identified and advanced in policy. No policies or proposals have been put forward in the First Steps engagement to be assessed at this stage.

However, consultation on the First Steps engagement document provides and opportunity for individuals and groups with protected characteristics to be involved in the development of the New Local Plan and help ensure that equalities issues and opportunities are adequately considered and addressed in the Plan.

Age	The First Steps engagement will seek the feedback of individuals and groups of all ages, taking steps to actively engage young people who are often not engaged in this process
Disability	The First Steps engagement will actively seek the feedback of representative groups and will ensure that key engagement material is able to be accessed in an accessible format
Gender reassignment	The First Steps engagement will not discriminate on the grounds of gender reassignment. It will actively seek the feedback of representative LGBTQ+ groups, including those representing transgender people.
Marriage and civil partnership	The First Steps engagement will not discriminate on the grounds of whether a participant is married or in a civil partnership
Pregnancy and maternity	The First Steps engagement will not discriminate on the grounds of pregnancy and maternity
Race	The First Steps engagement will seek the feedback of individuals and groups of all ethnic groups, taking steps to actively engage minority groups that are often poorly represented in similar engagements
Religion or belief	The First Steps engagement will seek the feedback of individuals and groups of all religions and belief and will actively look to promote the engagement through religious organisations
Sex	The First Steps engagement will not discriminate on the basis of sex
Sexual orientation	The First Steps engagement will not discriminate on the grounds of sexual orientation and will actively seek the

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	feedback of representative groups
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