Partial Business Regulatory Impact Assessment (BRIA)



Clyde Marine Planning Partnership

Developing a Regional Marine Plan for the Clyde

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Abbreviations used in this document

Term	Abbreviation
Business Regulatory Impact Assessment	BRIA
Clyde Marine Planning Partnership	CMPP
Clyde Regional Marine Plan	CRMP
Clyde Marine Region	CMR
Child Rights and Wellbeing Impact Assessment	CRWIA
Equality Impact Assessment	EQIA
Habitats Regulations Appraisal	HRA
Island Communities Impact Assessment	ICIA
Marine Policy Statement	MPS
National Marine Plan	NMP
National Marine Plan interactive	NMPi
Sustainable Marine Environment Initiative	SSMEI
Sustainability Appraisal – Sustainability Environmental Assessment	SA-SEA

Partial Business and Regulatory Impact Assessment

Title of Proposal – Clyde Regional Marine Plan

1. Purpose and intended effect

Background

1.1. The Marine and Coastal Access Act 2009 and the UK Marine Policy Statement (MPS) provide a statutory framework for implementing marine planning in UK waters. The Marine (Scotland) Act 2010 was established to improve the management of marine resources and the conflicts arising between competing demands in Scottish waters. In 2015, Scottish Ministers adopted Scotland's National Marine Plan (NMP) which sets out strategic policies for the sustainable development and use of Scotland's marine resources out to 200 nautical miles.

1.2. The Marine (Scotland) Act 2010 also allowed for regional planning to be developed by Marine Planning Partnerships to consider the local context of smaller ecosystem units, extending out to 12 nautical miles. The Scottish Marine Regions (SMR) were defined in the Scottish Marine Region Order 2015. The Scottish Marine Region for the Clyde was defined in Article 3 of this Order, hereafter referred to as the Clyde or Clyde Marine Region (CMR). The Clyde Marine Planning Partnership (CMPP) was established in 2016 and received a Direction from Scottish Ministers in 2017 to develop a Clyde Regional Marine Plan (CRMP).

1.3. The CRMP will provide a framework for integrated, sustainable and co-ordinated planning and management of the CMR's environmental, economic and community resources. The CMPP has worked together with regional stakeholders to create the CRMP that addresses local issues and pressures on the coastal and marine environment.

1.4. The policies within the CRMP have been developed in accordance with existing international (e.g. the United Nations Convention on the Law of the Sea) and national legislation and frameworks (e.g. the NMP).

Objectives

1.5. The CRMP will contribute towards meeting the UK's shared vision of having clean, healthy, safe, productive and biologically diverse seas by ensuring that the CMR is managed sustainably to meet the long-term needs of nature and people. The CRMP will also help the Scottish Government achieve its central purpose: to create a more successful country, with opportunities for all of Scotland to flourish, by increasing sustainable economic growth. This central purpose is also at the core of the Scottish Government Economic Strategy. Additionally, the CRMP supports the following National Outcomes:

- We live in a Scotland that is the most attractive place for doing business in Europe.
- We realise our full economic potential with more and better employment opportunities for our people.
- We live in well-designed, sustainable places where we are able to access the amenities and services we need.
- We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.
- We value and enjoy our built and natural environment and protect it and enhance it for future generations.
- We reduce the local and global environmental impact of our consumption and production.

1.6. The vision of the CRMP is 'The marine and coastal environment of the CMR is clean, healthy, safe, productive and biologically diverse, with fair access for all. It is managed to ensure

sustainable multiple use which enables nature to flourish and supports thriving resilient local communities.'

1.7. The aims of the CRMP are:

Climate change mitigation and adaptation

- Contribute to Scotland's transition to a low-carbon economy.
- Support resilient local communities in the Clyde Marine Region to mitigate and adapt to the consequences of climate change.
- Promote the use of marine and coastal assets in the CMR to respond to climate change issues.

Sustainable development

- Provide a framework for safe and sustainable development and activities which encourages innovation and attracts future investment in marine and coastal assets in the CMR.
- Provide guidance to marine developers on the early identification of localities of most and least constraint, including consideration of potential environmental factors and sectoral interactions.
- Underpin the regeneration of urban coastal areas and support a sustainable economy in rural coastal areas.

Healthy and biologically diverse marine and coastal environment

- Maintain and enhance the health of the CMR, including biodiversity and the landscape/seascape, by protecting and improving its natural resources.
- Ensure that the Marine Protected Area network contributes to the protection and enhancement of the CMR's biodiversity and identify other opportunities for environmental enhancement.
- Ensure that use and developments contribute to protection and enhancement of the Clyde Marine Region's Priority Marine Features.

Wellbeing of communities

- Promote sustainable and socially inclusive development and use of marine and coastal resources, including through improvements in access.
- Support the connection of people to the CMR through cultural heritage, work opportunities, educational initiatives and recreational pursuits.
- Contribute to the wellbeing and cultural diversity of local communities.

1.8. The CRMP is committed to contributing towards achieving global goals (e.g. Biodiversity Targets) and addressing global issues (e.g. climate change).

Rationale for Government intervention

1.9. The CMR has a variety of marine users that engage in different activities in the coastal and marine environment; many rely on the health of the coastal and marine ecosystems for their interests and businesses. As these activities may use the same resources and/or space, there is potential for conflict. Balancing economic, environmental and social needs can therefore be challenging. The CMR supports active sea fisheries, aquaculture, tourism and recreational businesses, is home to important wildlife and contains important historic environments. The CMR also has key shipping and transport links, such as major ports and lifeline ferry services, a nationally important Naval Base and energy infrastructure. This range of potentially competing uses of the coastal and marine environment can place pressure on some of the Region's marine and coastal habitats and species, as identified in the CMR Assessment. This Plan aims to prevent future mismanagement of the Region's resources and to protect and enhance the health of the Region's marine and coastal ecosystems so that they can in turn support businesses, sectors and other marine users who rely on these ecosystems. Mismanagement could lead to consequences for the Region's marine and coastal habitats and species and the goods and services they provide. Developers and other marine users may also

experience an increase in costs and uncertainty as a result of mismanagement. As a result, poor management in the CMR could impact the progress towards fulfilling Scottish Government national outcomes.

1.10. The CRMP, once adopted by Ministers, will be used by applicants to shape proposals, public authorities to guide decision-making and other marine users to understand how the Plan supports the sustainable development and use of the CMR. The CRMP supports Scotland's NMP in a regional context. The CMPP is a statutory consultee for pre-application consultations and marine licensing applications. The Partnership will provide advice and comments to applicants and the Marine Directorate Licensing Operations Team in line with objectives and policies in the CRMP.

2. Consultation

Clyde Marine Planning Partnership

2.1. Regular CMPP Members' meetings have been held throughout the plan development process to discuss key issues and approaches. Membership is made up of over 20 organisations (and individuals) representing planning authorities, environmental interests and key sectors such as fisheries, aquaculture, shipping, recreation and tourism. In addition, Clyde 2020, a sub-group of the CMPP which aims to bring together both scientific research and practical measures to improve the marine ecosystem of the Clyde, provided input towards plan development, particularly with regards to the sea fisheries chapter.

2.2. CMPP Members, representing key stakeholders and sectors in the area, are updated regularly through Members' Meetings, emails, newsletters and the CMPP website.

Within Government

2.3. Officials within Marine Directorate and the wider Scottish Government have been consulted from the outset of the plan-making process.

2.4. Historic Environment Scotland, NatureScot, the Scottish Environment Protection Agency and Scottish Forestry were also consulted throughout the plan development process.

2.5. Following the public 10-week pre-consultation (see para. 2.9), a draft plan was submitted to Marine Directorate in July 2020. Nine further tranches of corrections were carried out with a plan draft intended for statutory consultation submitted with this partial BRIA assessment in June 2026.

Public Consultation

2.6. The first Statement of Public Participation (SPP) was given Ministerial approval in December 2017 and was subsequently published. The SPP has since been updated to reflect relevant changes through the plan development process. More information on the SPP and updates so far can be found on the CMPP website.

2.7. The CMPP provides regular updates to the public through the CMPP's newsletter, website and twitter. E-newsletters that include Plan updates are issued regularly to between 800 and 900 subscribers.

2.8. Early public engagement between 2017 and 2018 included Marine Spatial Planning challenge game sessions, Public Dialogue sessions in Tarbert and Greenock, schools engagement with 14 to 16 year olds and open policy development workshops on: marine litter; mobile species and noise; and the condition of seabed habitats, fish and shellfish in the Clyde.

2.9. A public 10-week pre-consultation was undertaken from 18th March 2019 until 27th May on the draft CRMP and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA). During the pre-consultation, the CMPP held 28 public events throughout the CMR. A total of 318 people attended these events. This information is summarised in Table 1.

Table 1: *Attendance (n) at the pre-consultation events.*

Event	***n***
Ballantrae Community Centre: Drop-in	5
Girvan, The Quay Zone: Information stall	18
Lamlash, The Octopus Centre: Information stall	10
Brodick Public Hall: Presentation and Q&A	8
Ayr, Citadel Sports Centre: Information stall	12
Ayr Town Hall: Presentation and Q&A	3
Clydebank Leisure Centre: Information stall	18
Irvine Scottish Maritime Museum: Information stall	8
Ardrossan Civic Centre: Presentation and Q&A	4
Glasgow, Hillhead Library: Information stall	17
Dumbarton, Denny Civic Theatre: Drop-in	7
Inverkip Community Hub: Presentation and Q&A	3
Helensburgh, Victoria Hall: Drop-in	9
Greenock, Royal West of Scotland Amateur Boat Club: Presentation and Q&A	19
Port Glasgow Town Hall: Presentation and Q&A	2
Glasgow Science Centre: Information stall	33
Glasgow, Fairfield Govan Heritage Centre & Workspace: Presentation and Q&A	0
Arrochar, Three Villages Hall: Drop-in	3
Lochgoilhead, Village Hall: Drop-in	15
Dunoon Burgh Hall: Drop-in	15
Rothesay, Bute Museum: Information stall	20
Rothesay Library: Presentation and Q&A	31
Largs, Brisbane Centre: Presentation and Q&A	26
Lochgilphead, Community Education Centre: Drop-in	5
Tarbert, Templar Arts & Leisure Centre: Drop-in	1
Campbeltown, Aqualibrium Leisure Centre: Information stall	15
Campbeltown Town Hall: Presentation and Q&A	1
Millport, Field Studies Council: Drop-in	10
TOTAL	**318**

2.10. The pre-consultation received 49 consultation responses from a wide range of marine sectors and stakeholders. From those 49 responses, 29 people answered the question referring to the regulatory impacts of the Plan. Table 2 summarises the number of responses received on question 7 in the pre-consultation, which sought views on the regulatory impacts of the Plan:

7. Please tell us about any potential regulatory impacts (whether the way an activity/process is carried out is affected by the Plan), either positive or negative, that you think any or all of the objectives/policies in the Clyde Regional Marine Plan may have.

These responses have been taken into account, together with further comments from CMPP members and the Marine Directorate in development of the draft CRMP and in this partial Business Regulatory Impact Assessment (BRIA) as appropriate.

Table 2: *Clyde Regional Marine Plan pre-consultation responses to question 7.*

Respondent group (total responses)	**Number of responses to question 7**
Individuals (24)	15
Aquaculture (3)	3
Environment / conservation (2)	1
Fisheries (3)	2
Industry / transport (2)	2
Local authority (6)	2
Local group (1)	1
Other public sector / bodies (5)	0
Recreation / tourism (2)	2
Other (1)	1
Total	29

2.11. Public dialogue sessions were held in Glasgow, Ayr and Dunoon between November and December 2019 to understand how the general public, who has not previously engaged with marine planning and is not connected to a marine industry, perceived the draft sea fisheries and aquaculture chapters.

2.12. The CMPP Public Engagement Officer attended/organised a range of events from May 2019 onwards to deliver wider public engagement alongside the development of the CRMP and to inform people who would not normally engage in marine planning.

2.13. Public events will take place during the statutory consultation.

Business

2.14. Representatives from the relevant sectors have been included in developing respective policies. Working groups were organised to develop policy related to: sea fisheries; aquaculture; sport, recreation and tourism; shipping, ports, harbours and ferries. Updates were provided through a stakeholder distribution list. Most stakeholder working group meetings took place between September 2017 and August 2018. Three additional working group meetings were held in November and December 2019 to further develop the sea fisheries, aquaculture and natural heritage chapters in light of pre-consultation responses.

2.15. Business interests are directly represented on the CMPP by British Marine, Caledonian MacBrayne, Clyde Fishermen's Association, Field Studies Council, Clydeport Operations Ltd., BakkaFrost, Scottish Sea Angling Conservation Network. Organisations which are supportive of business interests but are publically funded are represented on the CMPP by Caledonian Maritime Assets Ltd., Loch Lomond and the Trossachs National Park, Scottish Canals, Visit Scotland and the South West Coast Regional Inshore Fisheries Group.

2.16. During the consultation, face-to-face meetings will be held with business owners who could potentially be affected by the CRMP. Businesses involved in these discussions will be from the following broad range of sectors:

- Sea Fisheries
- Aquaculture
- Sport, recreation and tourism
- Shipping, ports, harbours and ferries
- Energy, subsea cables and pipelines
- Defence

and also from a broad range of sizes - Micro enterprise: <10 employees; Small enterprise: 10-49 employees; Medium-sized enterprise: 50-249 employees; and Large enterprise: 250+

employees. A face-to-face meeting will also be held with an investment company to establish implications for potential inward investment in the CMR once the plan is in place.

2.17. Wider engagement with businesses will also take place via an online survey during the consultation and online meetings if requested. Data collected during the consultation from face-to-face meetings and the online survey will contribute towards completing the Scottish Firms Impact Assessment and the final BRIA.

3. Options

Option 1 – Do Nothing

3.1. Under this option, the CRMP would not be developed and adopted. However, the existing policy framework governing Scottish inshore waters (out to 12 nautical miles) would remain, including the UK MPS and the NMP, as well as the existing regulatory framework.

3.2. Not developing the CRMP is **not perceived to be a viable option.** Regional marine planning has its origins in the Scottish Sustainable Marine Environment Initiative (SSMEI); a voluntary Firth of Clyde Marine Spatial Plan was developed as part of the SSMEI programme between 2006 and 2010. The Marine (Scotland) Act 2010 enables statutory national and regional marine planning and the NMP confirms that marine planning will be implemented at a local level within Scottish Marine Regions. The CRMP supports the NMP by providing further detailed policy in a regional context and is required to deliver marine planning at the regional level in order to ensure proper management of the Region's marine resources. The stakeholder-led approach taken by the CMPP to develop the CRMP has ensured buy-in from public bodies, sectors and environmental organisations working in the CMR. The size, geography, ecology and use of the CMR lend themselves well to a regional approach to marine planning.

3.3. Without the CRMP, the effectiveness of regional marine planning and the future of RMPs could be affected. Developing the CRMP would provide opportunities to share knowledge with other Marine Planning Partnerships.

Option 2 – Development and adoption of a Clyde Regional Marine Plan

3.4. Under this option, a CRMP would be developed and adopted by Scottish Ministers. A statutory consultation would take place and it would provide all stakeholders with the opportunity to consider whether the Plan is fit for purpose as a regional marine plan. The CRMP would then be reviewed and amended based on consultation responses.

3.5. The impacts of the Plan would be fully assessed via Sustainability Appraisal – Sustainability Environmental Assessment (SA-SEA), Habitats Regulations Appraisal (HRA), BRIA, Child Rights and Wellbeing Impact Assessment (CRWIA), Equality Impact Assessment (EQIA) and Island Communities Impact Assessment (ICIA).

3.6. In line with the NMP and other national and global frameworks, the CRMP uses the ecosystem approach and the guiding principles of sustainable development to set out policies and conditions for development in the Region. The CRMP will contribute to the United Nations Sustainable Development Goals and will also support delivery of the Scottish Government's National Outcomes, in particular for the Economy, Fair Work and Business, Health and the Environment. The precautionary principle is applied consistently in accordance with the Scottish Government's sustainable development policy.

3.7. The CRMP would be adopted by Scottish Ministers to provide a statutory policy framework and would consolidate the requirements of the NMP, the UK MPS and existing international commitments. Once adopted, the CRMP would provide a statutory framework to support effective decision-making and appropriate inward investment in the CMR to enable the

delivery of the Plan's long-term vision and aims. The experience gained through developing the CRMP can guide future RMPs and the work of other Marine Planning Partnerships.

Sectors and groups affected

All Options

3.8. A number of sectors and groups may be affected by the adoption of the CRMP. These sectors and groups will also be affected if the Plan is not adopted. Affected groups include:

- organisations applying for consent for development(s) and/or activities within the CMR,
- coastal communities around the CMR,
- visitors to the CMR,
- non-business users of the CMR
- the Scottish Government and Executive Agencies,
- Public Bodies, including Local Planning Authorities,
- voluntary and charitable organisations working around the CMR, and
- Regional Marine Planning Partnerships.

Benefits

Option 1

3.9. No additional benefits are expected to arise from this option.

Option 2

3.10. Adopting and implementing the CRMP will help deliver the benefits of a marine planning system set out in the Final Regulatory Impact Assessment for the Marine (Scotland) Act 2010, as well as other identified benefits. Benefits include:

- reducing planning risk and uncertainty,
- a more informed site selection process,
- increased resilience to threats such as climate change,
- meeting international and national obligations,
- economic benefits – i.e. more efficient use of resources, reduced conflict, greater confidence and certainty for industry/developers,
- environmental benefits – i.e. protecting and enhancing biodiversity and including it in planning and management decisions, nature conservation, protecting the historic marine environment, and
- social benefits – i.e. improved stakeholder engagement opportunities, educational opportunities.

3.11. Additional benefits from the regional approach taken in the CMR include:

- increasing clarity and consistency of guidance to developers,
- engagement of stakeholders (including the public) more directly through governance of the CMR,
- responding to the distinctive nature of the CMR, and
- addressing the different value systems within the Region and fostering a better understanding of ocean and coastal literacy.

3.12. The policies in the CRMP do not aim to repeat what is in the NMP or in other legislation and regulation; they aim to add value based on issues identified in the CMR Assessment and to deliver the vision, aims and objectives of the Plan. Some policies synthesise existing regulations to provide clarity to marine users, particularly where existing regulations support improvement of an issue identified within the CMR Assessment. Other policies provide additional detail to help deliver existing national policies at a regional level.

3.13. This partial BRIA does not quantify additional benefits that would be experienced as a result of adopting this option. Instead, this partial BRIA takes a qualitative approach which analyses the

policies that have been identified at this stage of the BRIA process that are likely to have an impact on the potential additional benefits experienced by the public, private and third sectors. Following any relevant responses received during the statutory consultation process, the policies will be re-assessed and impacts will be quantified as appropriate. Quantifying potential additional benefits to businesses will be informed through consultation with relevant stakeholders via face-to-face interviews and an online survey that will be carried out during the statutory consultation. Data collected from businesses will be used to inform and complete the Scottish Firms Impact Test (see section 4).

3.14. The policies which are likely to have anticipated additional benefits are detailed in Annex 1. Most policies have benefits in terms of providing clarity, improving efficiencies, reducing long-term costs or improving the ecosystem on which many organisations rely. Policies also contribute to a joined up approach between land use planning and marine planning. Sectoral policies provide benefits to sectoral operators and upstream businesses through support of certain developments and activities.

3.15. Additional wider benefits of the CRMP include improved public understanding about the issues affecting the CMR; a more accessible Region, including for people with protected characteristics, which helps to overcome physical, cultural and economic barriers and encourages independent living; and local climate change mitigation and adaptation.

3.16. The CRMP will provide future Marine Planning Partnerships with a potential model for developing and preparing RMPs. The Plan's contributions will likely improve the effectiveness of regional marine planning, whilst also helping planning and licensing authorities to manage the marine environment, the CMR's resources and the conflicts that may arise in the Region.

Costs

Option 1

3.17. This option is not envisaged to create direct additional costs for the sectors and groups mentioned above because none of the existing policies or associated costs would change. However, accepting this option could lead to increased costs associated with conflict, mismanagement, negative environmental impacts and climate change impacts. Developers could also face additional indirect costs associated with ongoing uncertainty with licence applications and marine planning.

3.18. This option could undermine the effectiveness of the NMP and future RMPs.

Option 2

3.19. Policies within the Plan are for use by applicants to shape proposals, public authorities to guide decision-making and other marine users to understand policy for sustainable development and use of the CMR. The CRMP has general policies relating to:

- climate change,
- the historic environment,
- landscapes/seascapes,
- coastal processes, coastal flood and storm damage,
- natural heritage,
- non-native species,
- marine litter, and
- connecting people to the CMR.

Other policies are specific to sectors:

- all sectors,
- sea fisheries,
- aquaculture,
- sport, recreation and tourism,
- shipping, ports, harbours and ferries,

- energy, subsea cables and pipelines,
- defence, and
- marine aggregates.

The Plan also includes recommendations for marine users/local management to inform the general management of all activities within the Region, including those which are not managed through consents or licensing.

3.20. The policies set out in the Plan will likely influence the sectors and groups specified in section 3.8. The policies can influence:

- the preparation of applications by developers,
- the assessment of applications by consenting/licensing authorities,
- the choice of location of marine developments and activities, and
- the requirements placed on the construction, operation and expansion of marine developments.

3.21. This partial BRIA does not quantify additional costs that would be incurred as a result of adopting this option. Instead, this partial BRIA takes a qualitative approach which analyses the policies that have been identified at this stage of the BRIA process that are likely to have an impact on the potential additional costs incurred by the public, private and third sectors. Following any relevant responses received during the statutory consultation process, the policies will be re-assessed and impacts will be quantified as appropriate. Quantifying potential additional costs to businesses will be informed through consultation with relevant stakeholders via face-to-face interviews and an online survey that will be carried out during the statutory consultation. Data collected from businesses will be used to inform and complete the Scottish Firms Impact Test (see section 4).

3.22. The policies which are likely to have anticipated additional costs are detailed in Annex 1. Many of the policies have limited additional cost as they are already included within the regulatory framework, for example in the NMP; the policy of the CRMP adds detail of how to deliver NMP policy at the regional level. Many policies *encourage* certain developments, activities or initiatives which may lead to additional cost if carried out, but are not mandatory. Recommendations also indicate best practice but are not mandatory. However, some policies will incur additional costs for the public, private or third sector where additional information/documents are required or where demonstration of consideration of the policy is required during planning/licensing processes. Overall, the CMPP expects the benefits of the CRMP to outweigh the costs, although the benefits and costs may accrue to different sectors. This will be explored further when completing the full BRIA.

3.23. The CRMP will be submitted to Scottish Ministers for approval once the Plan has been finalised after the statutory consultation. The conditions set out in Annex 1 will only apply to developments and applications after the Plan has been approved.

4. Regulatory and EU Alignment Impacts

4.1. This section will be informed and completed by the evidence gathered during the statutory consultation and will be completed in the final BRIA. The consultation process will involve written consultation responses, face-to-face meetings and an online survey.

4.2. Consultation with businesses will enable the CMPP to consider the impact of the proposals on, and within the changed context of the UK having left the EU on 31 December 2020. The consultation will consider three distinct, but related regulatory factors related to leaving the EU: intra-UK trade, international trade and the Scottish Government's EU alignment policy. The final BRIA will therefore provide a quantitative assessment of the potential impacts the CRMP may have on regulation and EU alignment with regard to businesses.

5. Scottish Firms Impact Test

5.1. This section will be informed and completed by the evidence gathered during the statutory consultation and will be completed in the final BRIA. The consultation process will involve written consultation responses, face-to-face meetings and an online survey.

5.2. Consultation with businesses will enable the CMPP to understand and quantify anticipated costs and benefits to businesses and highlight these in this section. The final BRIA will therefore provide a quantitative assessment of the potential impacts the CRMP may have on businesses.

6. Competition Assessment

6.1. The potential impact the CRMP will have on free market competition will be explored and assessed in more detail during the consultation stage. To ensure competition is assessed at a regional level, the competition filter questions will be included in stakeholder interviews and the BRIA survey. This will allow the CMPP to capture any competitive advantages or disadvantages that may be experienced as a result of this regional marine plan. For example, differences between regulatory requirements across Scottish Marine Regions may impact on businesses and their ability to carry out developments and/or activities in the CMR. Policies in the CRMP may burden developers with greater costs associated with the CRMP's requirements that may not be experienced in other regions. Alternatively, adhering to the CRMP and its policies that support sustainable development and use may make business activities more attractive.

6.2. The policies within the Plan may affect a range of coastal and marine activities, in particular where developers require planning permission or a marine licence for new or amended operations. Such activities may include renewable energy and associated infrastructure, aquaculture and ports and harbours. The Plan promotes sustainable development and use of resources, which is in line with Scottish and global aspirations. Businesses and sectors will need to adapt their ways of working as appropriate to adhere to emerging climate and biodiversity agendas.

Competition Filter Questions

Answers to the Competition Filter Questions will be updated accordingly based on data collected during the consultation stage.

6.3. *Will the proposal directly or indirectly limit the number or range of suppliers?*
No/Limited. It is unlikely that the number or range of suppliers will be directly or indirectly limited by the adoption of the CRMP. The policies within the Plan will apply to new and existing developers equally, irrespective of business size. A proportionate approach will be taken when applying policies to proposals. Not all policies will be relevant to all proposals; applicants should provide sufficient and appropriate supporting information based on sound evidence to demonstrate that their proposal is in line with all relevant policies in this Plan.

6.4. *Will the proposal limit the ability of suppliers to compete?*
No/Limited. It is unlikely that the policies within the CRMP will limit suppliers' ability to compete or negatively affect businesses' route to market or the geographical markets they can sell to. The CRMP supports supplying local and other markets with sustainable products which may increase businesses' market opportunities. For example, recommendation rCONNECT 6 encourages initiatives to supply sustainable aquaculture and fisheries products from the CMR to local businesses. Although this is a recommendation, not a policy, if followed, it may provide local suppliers with new market opportunities.

6.5. *Will the proposal reduce suppliers' incentives to compete vigorously?*
No/Limited. It is unlikely that the policies in the CRMP will reduce suppliers' incentives to compete.

7. Consumer Assessment

7.1. It is not envisaged that the CRMP will have an adverse impact on consumers. Whilst recommendation rCONNECT 6 encourages initiatives to supply sustainable aquaculture and fisheries products from the CMR to local shops and restaurants, this is a recommendation, not a policy and if followed, should improve the consumer offering of locally sourced products in the CMR.

7.2. Policies in the Plan support and encourage conditions to enable sustainable development and activities, which may impact on a product or service and thus also consumers. If there are any potential additional costs to businesses, the Plan does not specify whether the business or consumer will carry the cost. Although consumers may benefit from a greater availability of sustainable products, they may also be impacted by an increase in price. This will be explored further during the consultation.

8. Test of Business Forms

8.1. It is not envisaged that the CRMP will result in the creation of new forms for businesses or sectors to deal with. There will be an amendment to the application form for marine licence applications as applicants will be required to complete a box demonstrating consideration of the CRMP. This already occurs in relation to the NMP.

9. Digital Impact Test

9.1. The CRMP will be available offline and online; however, the implementation of the Plan will rely on applicants and decision-makers having access to National Marine Plan interactive (NMPi), an online interactive mapping system. Online usability testing will ensure any impacts are minimised. This should contribute to efficiencies across all businesses and sectors and is in line with the continuing increasing use of online technology. This is not anticipated to have an impact on any businesses or sectors operating offline as applicants are required to provide sufficient and appropriate supporting information based on sound evidence to demonstrate that their proposal is in line with the relevant policies in the CRMP; applications for small-scale, low-risk proposals would be able to do that without access to NMPi.

9.2. Policies in the Plan consider changing digital technologies and markets. Examples of this include: recommendation rFISH 1 (although not a policy) which makes reference to Fully Documented Fisheries and aquaculture policies which consider emerging finfish farming technologies which may include digital technology.

10. Legal Aid Impact Test

10.1. It is not envisaged that the CRMP will have any impact on the current levels of access to justice through legal aid or on the possible expenditure from the Legal Aid fund.

11. Enforcement, sanctions and monitoring

11.1. The CMPP will review the effects of the Plan and whether progress is being made towards achieving its objectives as part of the 3 year review process. The CRMP will be delivered through existing licensing and consenting frameworks. Enforcement and authorisation decisions carried out by public authorities must have regard to the CRMP.

12. Implementation and delivery of plan

12.1. The Plan will be submitted to Scottish Ministers once the Plan has been finalised after the statutory consultation and will have statutory status once it is adopted by Scottish Ministers.

13. Post-implementation review

13.1. Once the Plan is adopted, the CMPP will review the effects of the Plan and whether progress is being made towards its objectives. A report must be published within 3 years from the date of when the Plan is adopted. Scottish Ministers will then consider and decide if the Plan needs to be amended or replaced. As part of this review process, the analysis in the BRIA will be revisited and refreshed as appropriate.

14. Summary and Recommendation

14.1. It is recommended that Option 2 (the development and adoption of the CRMP) is adopted. This option would support the implementation of the NMP, underpin sustainable development and use of the CMR and inform future RMPs.

14.2. Under Option 2, a statutory consultation would take place and it would provide all stakeholders with the opportunity to consider whether the Plan is fit for purpose as a regional marine plan. The CRMP would be reviewed and amended based on consultation responses. The impacts of the Plan would also be fully assessed via SA-SEA, HRA, BRIA, CRWIA, EQIA and ICIA.

14.3. Identified costs/benefits to business will be addressed as part of the BRIA whereas wider economic cost/benefit will be addressed under the SEA. The Scottish Firms Impact Test will be completed as part of the final BRIA once the statutory consultation has been undertaken and all responses analysed.

Declaration and publication

I have read the partial Business and Regulatory Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs. I am satisfied that the potential positive and negative impacts on public, private and third sector have been assessed with the support of businesses and other stakeholders in Scotland.

Signed:

Date:

Minister's name: Gillian Martin

Minister's title: Cabinet Secretary for Climate Action and Rural Affairs

Contact point: Christopher Cutts / Jill Bunyan

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Annex 1: Detail of potential impacts identified at this stage of the BRIA process, on the public, private or third sector, of policies contained in the CRMP

Policy	Potential impacts – costs/benefits
Chapter 1: Climate Change	
Policy CC 1: Proposals for development and/or use should demonstrate that they have considered appropriate and proportionate measures to: a) minimise emissions of greenhouse gases over the lifespan of the proposal; b) adapt to the current and future likely impacts of climate change over the full lifespan of any proposal, including any decommissioning/remediation required; c) support or increase sustainable transport use and local transport solutions if applicable.	Limited/No additional costs because the measures listed in this policy help deliver policy GEN 5 in the NMP which already requires marine planners and decision makers to act in the way best calculated to mitigate, and adapt to, climate change. The policy provides detail on how policy GEN 5 can be achieved in the CMR. It also supports other national legislation and initiatives to deliver climate change mitigation and adaptation. Potential additional benefits are anticipated from the measures because they will make developments/activities more resilient. In the long-term, the benefits should outweigh the costs.
Policy CC 2: Proposals for development and/or use should avoid significant harm or damage to carbon stores, including those in intertidal habitats in the Clyde Marine Region. Where an impact on a recognised carbon store (see Maps CC 1 & 2) may occur, it should be demonstrated prior to development taking place that any impacts can be suitably mitigated, using the mitigation hierarchy.	Potential additional costs depending on what additional work would be required to establish whether the development/activity might impact on carbon stores and survey work required; however, NMP GEN 5, section 4.9 requires consideration of reduced pressure on carbon sinks. This policy helps to deliver the NMP at the local level. Some recognised carbon stores are also Priority Marine Features so impacts will need to be avoided and mitigated in those cases according to existing legislation. There is a great degree of uncertainty around the impacts of activities on carbon stores, especially with regards to the impacts of fishing on the ability for sediments to retain carbon. Therefore, there could be high potential costs associated with this policy in terms of additional research, use of new technologies, etc. which could add significant costs to the public sector. This policy may disproportionately impact fishing activities because activities are more wide-spread compared to other activities. Individual fishers are not expected to carry research costs, however gear costs could impact at the individual vessel level. Potential additional benefits could be delivered, such as those associated with protecting carbon stores which provide nature-based climate change mitigation opportunities, contributing towards national climate change targets and protecting important habitats and species and their ability to sequester carbon.
Policy CC 3: Proposals for development and/or use are encouraged to deliver positive effects on the capacity of recognised carbon stores (as identified in the Scottish Blue Carbon Action Plan) including to support their expansion.	Limited/No additional costs because this policy *encourages* positive effects on carbon stores (also see NMP GEN5 section 4.9). If this policy is adhered to, it could deliver potential

Policy	Potential impacts – costs/benefits
	additional benefits, such as those associated with protecting and enhancing carbon stores which provide nature-based climate change mitigation opportunities, contributing towards national climate change targets and protecting important habitats and species and their ability to sequester carbon.
Policy CC 4: Proposals for the enhancement of marine and coastal natural carbon stores, such as habitat restoration or creation and native species restoration, and proposals for other nature-based solutions to mitigate and adapt to the impacts of climate change will be supported and encouraged where they demonstrate consideration of potential climate change impacts on the proposal, and are in accordance with the other policies within this Plan.	Limited/No additional costs because these policies *encourage* proposals to mitigate and adapt to the impacts of climate change (also see NMP GEN5 section 4.9). If these policies are adhered to, potential additional benefits may be delivered, such as those associated with increasing nature-based climate change mitigation solutions, an increase in research and evidence related to carbon stores, improving resilience to climate change and enhancing biodiversity which also supports climate resilience. Policy adherence here could also potentially assist in providing an evidence base for Policy CC 2.
Policy CC 5: Proposals for nature-based solutions to mitigate and adapt to the impacts of climate change are encouraged and will be supported where they demonstrate appropriate consideration of the effects of the proposal on the wider ecosystem and are in accordance with the other policies within this Plan.	
Recommendation rCC1: Developments are encouraged to promote climate justice and help society and the environment to be more resilient to the current and future likely impacts of climate change.	Limited/No additional costs because this is a recommendation and is not a policy; however, if this recommendation is followed, potential additional costs may be incurred associated with helping society and the environment to be more resilient. However, potential additional benefits are anticipated from the measures because they will make developments/activities more resilient. In the long-term, the benefits should outweigh the costs.
Chapter 2: Historic Environment	
Policy HE 1: Development(s) and/or activities will only be supported if they protect marine and coastal historic environment and cultural assets, their context and accessibility. If detrimental impact on historic environment and cultural assets is unavoidable, development(s) and/or activities must: a) demonstrate that alternative proposals have been explored, b) minimise impacts on these assets, and c) ensure mitigation measures are in place.	Limited/No additional costs because historical and cultural assets are protected through existing policy/legislation (e.g. Historic Environment Policy Statement). The measures help to deliver Policy GEN 6 of the NMP at a regional level. Potential additional benefits through increased awareness of marine and coastal historical and cultural assets around the CMR.
Policy HE 2: Proposals for development and/or use are encouraged to identify opportunities for enhancement of historic environment and cultural assets and/or their accessibility.	Limited/No additional costs because this policy *encourages* an action. If this policy is adhered to, potential additional benefits may be delivered, such as supporting local businesses by increasing visitors to and raising the profile of historical and cultural assets in the CMR.
Recommendation rHE 1: Efforts should be made to protect and promote non-structural and intangible marine and coastal cultural heritage. For example, through museums, visitor centres, festivals, or incorporation into development proposals.	Limited/No additional costs because this is a recommendation and is not a policy. However this recommendation supports developments/activities/initiatives that protect and promote cultural heritage. If this

Policy	Potential impacts – costs/benefits
	recommendation is adhered to, potential additional benefits may be delivered, such as supporting local businesses by increasing visitors to engage with the Region's coastal and marine cultural heritage and raising it's profile.
Chapter 3: Landscape/Seascape	
Policy SCAPE 1: Development(s) and/or activities will be supported if they demonstrate: a) consideration where appropriate of the Seascape/Landscape Assessment of the Firth of Clyde, the relevant planning authority Landscape Assessments and other relevant Strategic Development Frameworks, character appraisals and supporting documentation, b) how the proposal considers the visual impact on existing character, experience and quality of landscape/seascape and avoids or minimises visual intrusion and mitigates any negative landscape/seascape effects. This includes developed, altered and cultural landscapes as well as natural areas. Within the area of the Inner Clyde estuary, the proposal should also demonstrate how it recognises, enhances and reinforces the distinctive character of the River Clyde development corridor, including green corridor, landscape/townscape, cultural heritage, play, art, landmarks, lighting and smart technology considerations, and c) a high standard of design, in terms of siting, scale, colour, materials and form to ensure the development or coastal use change will be accommodated within specific landscape and seascape types (as shown in Map SCAPE 2).	Potential additional costs despite existing legislation on landscape/seascape, e.g. policy GEN 7 in the NMP and landscape policies in Local Development Plans (LDPs). These policies includes seascapes as well as landscapes, which means additional costs may be incurred related to considering visual impacts on land- *and* seascapes. The terminology used for different types of coastline in the Seascape/Landscape Assessment differs from the terminology used in LDPs. Considering different assessments and terminology could add to costs. Potential additional benefits may be delivered, such as those related to improved alignment between marine and land use planning and reduced visual impacts. The Plan provides improved clarity for investors in terms of landscape/seascape considerations in the CMR. The protection these policies give to landscape/seascape qualities around the CMR will potentially provide additional benefits to tourism and recreational businesses/interests and local communities.
Policy SCAPE 2: Proposals for development and/or use in the Inner Clyde estuary should consider how the proposal takes into account its effects on the distinctive character of the River Clyde Development Corridor.	
Policy SCAPE 3: Proposals for development and/or use that affect National Scenic Areas, National and Regional Parks, or Local Landscape Areas should demonstrate that they have considered that: a) they will not adversely affect the integrity of the area or its special qualities for which it has been designated, or b) any such adverse effects are clearly outweighed by social, environmental or economic benefits of national importance (or local importance for Local Landscape Areas). It should be considered whether or not a Design Statement is required to support a proposal for development or use that affects a National Scenic Area or National or Regional Park.	Limited/No additional costs because this policy synthesises information on the various landscape designations that are protected through existing legislation, such as the Scottish Planning Policy and legislation/policy related to National Parks. Potential additional benefits may be delivered, such as those related to improved alignment between marine and land use planning and clarity for investors in terms of designated areas in the CMR. The protection this policy gives to landscape/seascape qualities and condition around the CMR will potentially provide additional benefits to tourism and recreational businesses/interests and local communities.
Recommendation rSCAPE 1: Developments, infrastructure and facilities in a coastal or marine location should be maintained such that they do not have a significant adverse impact on the landscape/seascape qualities of an area.	Limited/No additional costs because this is a recommendation and is not a policy; however, if this recommendation is followed, potential additional costs may be incurred associated with maintaining infrastructure/facilities. Potential benefits would also arise, if this recommendation is followed, from improved visual amenity in the CMR, supporting certain businesses such as those involved in sport, recreation and tourism.
Chapter 4: Coastal Processes, Coastal Flood and Storm Damage	

Policy	Potential impacts – costs/benefits
Policy CP 1: Proposals for development and/or use below the Mean High Water Springs should demonstrate that they have considered the following, proportionate to the scale of development: a) the latest available UKCP sea-level rise and flood risk projections, and wave overtopping impacts where possible, relevant to the full lifespan of the proposal, including any decommissioning/remediation required, b) broader future climate projections and risks and opportunities identified within the UK national, regional and local climate change risk assessments, c) the Scottish Environment Protection Agency's Development Management Guidance, the relevant Local Flood Risk Management Plan and any relevant Coastal Change Adaptation Plan, d) sediment dynamics within the relevant coastal cell, including historical trends as indicated in outputs of the Dynamic Coast project and current or future anticipated dynamics, e) any potential exacerbation of flooding or coastal erosion in the wider area, f) protection and use of natural assets for coastal protection, including through options for managed realignment and beach nourishment, and allowing space for the natural assets themselves to adapt to climate change; and g) opportunities for Integrated Green Grey Infrastructure where natural assets cannot be used for flood alleviation.	Potential additional costs may be incurred to demonstrate consideration of this policy and/or to implement part of this policy; however, NMP GEN 5 Climate change already requires marine planners and decision makers to act in the way best calculated to mitigate, and adapt to, climate change. Potential additional benefits will also be delivered as developments/activities will be located in more suitable locations and will be at less risk to sea-level rise or coastal change in the future, providing improved resilience. Future costs, such as those associated with relocation and flood damage, may also be reduced.
Policy CP 2: Natural or artificial coastal zone and marine features which provide or could provide flood defence in the future should not be removed without due consideration of future flood risk. Removal of artificial coastal defence materials should only be supported when it can be demonstrated that there are no significant adverse impacts for the environment. Proposals for the removal of artificial coastal defence materials should demonstrate that they have considered positive impacts for the environment, for example where removal may offer a realignment option to allow accommodation space for natural coastal readjustment, habitat restoration and improved long-term resilience.	Limited/No additional costs because this policy adds additional detail to policy GEN 8 in the NMP. Flood risk management is also regulated through SEPA. Potential additional benefits may be delivered, such as improved resilience and benefits to environment/recreation/tourism if positive impacts are delivered when artificial coastal defence materials are removed.
Policy CP 3: The installation of new or replacement flood defences, coastal erosion and flooding alleviation works will be encouraged if coastal erosion or flooding threatens existing public infrastructure, important built development, including historic environment features, and where relocation options are not feasible.	Potential additional costs incurred in order to demonstrate that relocation options are not feasible. However, in the long-term, potential additional benefits will be gained from only installing flood defences where absolutely necessary.
Policy CP 4: For large marine and coastal infrastructure projects below the Mean High Water Springs that involve an element of lock-in or irreversibility , a climate change risk assessment (detailing flooding and coastal change risks to communities, businesses and infrastructure) should be undertaken and proportionate adaptation features should be included within the proposal in line with best practice guidelines.	Potential additional costs may be incurred related to completing a climate change risk assessment and including adaptation features; however, this policy supports NMP GEN 5 climate change. Potential additional benefits may be gained as large infrastructure projects will be more resilient to climate change. This policy may help reduce costs in the future, in particular for the public sector.
Recommendation rCP 1: Communication and connectivity between marine users and land users is encouraged to ensure that the coastal zone is managed and protected appropriately.	Limited/No additional costs because this is a recommendation and is not a policy; however, if this recommendation is followed, potential additional costs may be incurred associated with improving communication. Potential benefits would also arise, if this recommendation is followed, from improved management and protection.
Chapter 5: Natural Heritage	
Policy NH 1: Proposals for development and/or use should a) consider, where appropriate the potential for cumulative impacts affecting the marine and coastal environment; and	Limited/No additional costs because the conditions in this policy are covered by existing policy/legislation, such as policy

Policy	Potential impacts – costs/benefits
b) not result in significant adverse impacts on the national status of Priority Marine Features.	GEN 9 in the NMP and policies protecting designated sites and features. Synthesising key environmental protection measures in this policy could deliver potential additional benefits, such as making licensing requirements for developers and decision-makers clearer and avoiding impacts on any businesses and/or sectors that rely on protected habitats and species. Potential additional benefits may also be gained such as through improved resilience of marine and coastal ecosystems and ecosystem services as a result of environmental, habitat and species protection and supporting local businesses that rely on the Region's marine and coastal natural heritage.
Policy NH 2: Proposals for development and/or use should demonstrate, where appropriate, that they have considered: a) relevant conservation objectives and status of relevant Marine Protected Area network sites (Map NH 1 and Table 1), and other coastal designated sites (Map NH 2 and Table 1) and European sites; b) the actions identified in the Scottish Biodiversity Strategy.	Potential additional costs may be incurred related to demonstrating consideration of the various measures. Potential additional benefits may be gained, such as those associated with enhancing natural heritage assets and ecosystem functioning and supporting any businesses and/or sectors that rely on healthy habitats and species.
Policy NH 3: Proposals for biodiversity and/or ecosystem enhancement will be encouraged to demonstrate consideration of the effects of the proposal on the wider ecosystem and take potential climate change impacts on the proposal into account.	Limited/No additional costs because this policy *encourages* proposals for environmental enhancement. Potential additional benefits may be gained if proposals that are in line with this policy are delivered; for example, proposals could support businesses and/or sectors that rely on healthy ecosystems and enhanced ecosystem services.
Policy NH 4: Proposals for development and/or use that may limit the ability of diadromous fish species and other mobile species to migrate safely through the Clyde Marine Region should demonstrate that they have considered if suitable mitigation measures are in place.	Limited/No additional costs because this policy is covered by existing policy/legislation; policy WILD FISH 1 in the NMP is similar to this policy. This policy provides more detail on how policy WILD FISH 1 can be achieved in the CMR and reminds users to consider links to freshwater designated sites of importance. Potential additional benefits may be delivered, such as supporting businesses and/or sectors that rely on healthy stocks of diadromous fish species.
Recommendation rNH 1: Where a licence is not required, users carrying out small-scale hand cutting and/or gathering of seaweed are encouraged to consider the potential ecological cumulative impacts of multiple harvesting activities within proximity to each other. Communication between users carrying out seaweed harvesting operations within proximity to each other is encouraged.	Limited/No additional costs because this is a recommendation and is not a policy; however, if this recommendation is followed, potential additional costs may be incurred, because this recommendation is asking users carrying out an unlicensed activity to consider potential cumulative impacts. There may also be potential costs in terms of communication time / resources between users carrying out seaweed harvesting. Following this recommendation could also lead to potential additional benefits because this recommendation supports a sustainable industry.

Policy	Potential impacts – costs/benefits
Chapter 6: Non-Native Species	
Policy NNS 1: Proposals for development and/or use should demonstrate that they have considered that they have minimised the risk of introducing or spreading non-native species affecting seabirds and/or the ecological or recreational value of coastal habitats. Proposals should refer to the Scottish Government's Non-Native Species: Code of Practice. Where relevant, a site- or operation-based biosecurity plan should be developed in line with best practice Marine Biosecurity Planning guidance.	Potential additional costs may occur because, whilst this policy is covered by existing policy/legislation, such as policy GEN 10 in the NMP and the Wildlife and Countryside Act 1981 (as amended by the Wildlife and Natural Environment (Scotland) Act 2012), work to provide a biosecurity plan may be incurred by some organisations. Developers will need to be familiar with the voluntary CMR Biosecurity Plan and, where relevant, the voluntary Loch Fyne Marine Biosecurity Plan. Potential additional benefits may be gained by avoiding/reducing the introduction and spread of non-native species and associated impacts to business operations directly from the non-native species and/or as a result of reduced environmental health and productivity.
Recommendation rNNS 1: Initiatives are encouraged to research, eradicate and/or prevent the spread of non-native species.	Limited/No additional costs because this is a recommendation and is not a policy. The recommendation *encourages* initiatives to eradicate and/or prevent the spread of non-native species and does not specify any conditions which could impose costs if the recommendation is followed. If followed, the recommendation could deliver potential additional benefits, such as those associated with avoiding/reducing impacts of non-native species to business operations as a result of direct impacts or as a result of reduced environmental health and productivity.
Recommendation rNNS 2: All marine users in the Clyde Marine Region should: a) conform to the Scottish Government Code of Practice on Non-native species, the voluntary Clyde Marine Region Biosecurity Plan and, where relevant, the voluntary Loch Fyne Community Biosecurity Plan, b) proactively consider the risk of introducing or spreading non-native species, c) put in place biosecurity management measures to minimise the risk of introducing or spreading non-native species, and d) where relevant, develop a site-, event- or operation-based biosecurity plan in line with best practice Marine Biosecurity Planning guidance.	Limited/No additional costs because this is a recommendation and is not a policy; however, if this recommendation is followed, potential additional costs could be incurred by users associated with putting in place biosecurity measures and developing site- or operation-based biosecurity plans. Potential additional benefits could be gained, such as those associated with avoiding/reducing impacts of non-native species to business operations. If this recommendation is followed, costs associated with damage caused by non-native species would also be reduced.
Chapter 7: Marine Litter	
Policy ML 1: Proposals for development and/or use should consider the inclusion of a litter minimisation and management plan for its lifespan of the proposal, having regard to the following elements where appropriate: construction, active use and any decommissioning/remediation required. Where a plan is not included, proposals should demonstrate proportionate measures to avoid release of litter throughout the lifespan of the proposal.	Potential additional costs because proposals will have to include litter minimisation and management plans for their lifespan; however, this policy is in line with policy GEN 11 in the NMP. This policy provides more detail on how policy GEN 11 can be achieved in the CMR and it supports the Marine Litter Strategy for Scotland. Potential additional benefits may be delivered for businesses and/or sectors relying on a healthy and aesthetically pleasing marine and coastal

Policy	Potential impacts – costs/benefits
	environment, and where proposals contribute to the circular economy (e.g. obtaining more value from materials and resources). Effective litter minimisation and management from the outset may provide potential benefits of reduced development cost. Local Authorities and local communities will also potentially benefit from this policy as it aims to reduce the amount of litter entering the marine environment. Local landowners may benefit from reduced need to collect and dispose of coastal litter. Local charities which take time litter picking and beach cleaning may have recourses freed up to tackle alternative local issues.
Policy ML 2: Waste water infrastructure should be designed, wherever practicable, to reduce the risk of litter entering the marine environment through watercourses or any other pathway.	Potential additional costs related to designing waste water infrastructure to reduce the risk of litter entering the marine environment and to building the infrastructure. However, improving waste water infrastructure is on the River Basin Management Plan agenda so this policy might not add significant potential additional costs. Improving the design of waste water infrastructure could also provide potential additional benefits, such as reducing costs incurred in the future (e.g. reducing costs related to flooding due to a blockage or extreme weather conditions), reducing litter clean-up costs, reducing the potential for transmission of disease and infection from litter, addressing potential health concerns associated with the impact of plastics in the marine environment and avoiding impacts on businesses and/or sectors reliant on a healthy, biologically diverse and aesthetically pleasing marine and coastal environment. There may also be reputational benefits.
Recommendation rML 1: Through the Fishing for Litter scheme, or other similar schemes, port or harbour operators are encouraged to provide facilities to fishing vessels to dispose of any litter collected.	Limited/No additional cost because this is a recommendation and is not a policy; however, if this recommendation is followed, potential additional costs could be incurred related to providing facilities to dispose of litter. There are potential additional benefits in terms of reputation for harbour authorities and local fishing businesses (especially if the litter collected can be fed into the circular economy, recycled or reused), avoiding impacts on businesses and/or sectors reliant on a healthy, biologically diverse and aesthetically pleasing marine and coastal environment, and reducing the potential for transmissions of disease, infection or other health concerns associated with marine litter in the marine environment.
Recommendation rML 2: Businesses and organisations managing or handling plastic pellets, flakes or powders (nurdles), including shippers, transporters and recyclers, should adopt best practice guidance to prevent these plastics from entering waste water treatment systems and/or the marine environment.	Limited/No additional cost because this is a recommendation and is not a policy; however, if this recommendation is followed, potential additional costs could be incurred to put

Policy	Potential impacts – costs/benefits
	the best practice guidance in place. Potential additional benefits could be gained from adopting best practice guidance, such as retaining more value from materials and resources and preventing costs associated with adverse effects of plastics in the marine environment.
Recommendation rML 3: Development(s) and/or use in the marine and coastal environment should take measures to address marine litter entering the marine environment and should consider opportunities to contribute to the circular economy, for example by recycling old equipment. Initiatives which facilitate this are supported.	Limited/No additional costs because policy GEN 11 in the NMP already considers this and this recommendation supports the Marine Litter Strategy for Scotland. This recommendation provides more detail on how policy GEN 11 can be achieved in the CMR. Potential additional benefits may be delivered for businesses and/or sectors relying on a healthy and aesthetically pleasing marine and coastal environment and where proposals contribute to the circular economy (e.g. getting more value from materials and resources). Local Authorities and local communities will also potentially benefit from this recommendation as it aims to reduce the amount of litter entering the marine environment. Local landowners may benefit from reduced need to collect and dispose of coastal litter. Local charities which take time litter picking and beach cleaning may have recourses freed up to tackle alternative local issues.
Recommendation rML 4: The Coastal Litter Management Guidelines for Duty Bodies should be followed in carrying out beach cleaning operations. The support by public authorities of local community beach cleaning is encouraged where appropriate.	Limited/No additional costs because policy GEN 11 in the NMP already considers this and this recommendation supports the Marine Litter Strategy for Scotland. Local Authorities and local communities will also potentially benefit from this recommendation as it aims to reduce the amount of litter entering the marine environment. Local landowners may benefit from reduced need to collect and dispose of coastal litter.
Chapter 8: Connecting People to the Clyde Marine Region	
Policy CONNECT 1: Proposals for development and/or use should demonstrate that they have considered taking a proportionate approach to the following: a) engagement with stakeholders from relevant sectors, especially where there might be direct interactions between different uses and/or developments; and b) where relevant, the general public has been informed and consulted during development of the proposal, particularly if the proposal could significantly impact local communities.	Limited/No additional cost because this policy is in line with policy GEN 18 in the NMP and delivers that policy at the regional level. This policy may provide potential additional benefits associated with early and effective stakeholder engagement, such as a reduction in wasted/duplicated upfront application costs and reduced stakeholder conflict.
Policy CONNECT 2: Proposals for development and/or use which create and/or maintain coastal trails, paths and walkways, particularly those which connect coastal sites of local importance, are encouraged. These should be designed to prevent impacts on sensitive natural and cultural heritage.	Limited/No additional costs because this policy *encourages* the creation and/or maintenance of paths. Implementing this policy could deliver potential additional benefits, such as creating and maintaining connectivity between local communities and improving access to outdoor green/blue spaces for improved wellbeing opportunities, supporting the local economy by attracting more visitors to sites of local

Policy	Potential impacts – costs/benefits
	importance and supporting businesses and/or sectors that will benefit from such access and/or recreational infrastructure.
Policy CONNECT 3: Proposals for development and/or use should demonstrate that they have considered, where applicable, that: a) access rights to the marine environment are retained and improved, and b) access to the shore and water is optimised for sport, recreation and tourism, and safety issues have been addressed.	Limited/No additional costs because this policy is in line with the Land Reform (Scotland) Act 2003, although developers will need to demonstrate that this has been taken into account. Implementing this policy could deliver potential additional benefits, such as continued access to blue/green spaces for wellbeing, improving public support towards developments/activities and supporting businesses and/or sectors that will benefit from such access and/or recreational infrastructure.
Recommendation rCONNECT 1: All marine users and the general public are encouraged to engage with formal consultation processes in public authority decision-making about development(s) and/or use in the Clyde Marine Region. This can be achieved individually or as a member of a community, interest or sports groups.	Limited/No additional cost because this is a recommendation and is not a policy. If followed, this recommendation could deliver potential additional benefits, such as those associated with greater stakeholder engagement in formal consultation processes.
Recommendation rCONNECT 2: All users of the Clyde Marine Region should follow guidance set out in relevant codes and best practice guidelines, which include but are not limited to: *Natural Heritage* • Scottish Marine Wildlife Watching Code • A Guide to Best Practice for Watching Marine Wildlife • Scottish Outdoor Access Code • Scottish Entanglement Alliance Best Practice Guide for Fishermen *Non-Native Species* • Scottish Government Code of Practice on Non-Native Species • 'Check Clean Dry' Guidance *Sport, Recreation and Tourism* • Clyde Leisure Navigation Guide • The Green Guide to Coastal Boating • Catch and Release: A Guide to Best Practice • Outdoor events in Scotland – Guidance for organisers and land managers	Limited/No additional cost because this is a recommendation and is not a statutory policy. This policy brings together existing codes and best practice guidelines which will deliver potential additional benefits if followed, particularly to businesses and/or sectors which rely on a healthy marine environment. Proactive use of such codes and best practice guidelines may provide potential additional benefit as a business marketing opportunity.
Recommendation rCONNECT 3: Activities are encouraged which give opportunities to marine users, including the general public, to collect data (e.g. through citizen science projects).	Limited/No additional cost because this is a recommendation and is not a policy; the recommendation *encourages* opportunities for data collection. If followed, this recommendation could deliver potential additional benefits through improved knowledge understanding about the CMR as it supports data collection initiatives.
Recommendation rCONNECT 4: Activities and experiences are encouraged which engage with those people living in and/or visiting the Clyde Marine Region to improve their interest, awareness and/or knowledge of the Regions natural heritage, historic environment and cultural heritage including the Gaelic language, and/or marine sport and recreation opportunities. Activities and experiences should be accessible to all,	Limited/No additional cost because this is a recommendation and is not a policy; the recommendation *encourages* activities and experiences. If followed, this recommendation could deliver potential additional benefits, such as supporting the

Policy	Potential impacts – costs/benefits
including those with protected characteristics, should help overcome physical, cultural and economic barriers to participation and encourage independent living.	local economy by increasing the number of people engaging with the Region's natural, historic, cultural and recreational assets.
Recommendation rCONNECT 5: Activities are encouraged which engage local communities in identifying areas of marine litter accumulation, carrying out beach cleans, and/or communicating issues relating to marine litter. Beach clean organisers are encouraged to contribute to data collecting initiatives. This includes but is not limited to: the Marine Conservation Society's Beachwatch campaign, Fidra's 'Great Nurdle Hunt' data collection project and Keep Scotland Beautiful initiatives such as Upstream Battle.	Limited/No additional cost because this is a recommendation and is not a policy; the recommendation *encourages* activities. If followed, this recommendation could deliver potential additional benefits, such as supporting Local Authorities and any other Duty Bodies in reducing marine litter and engaging local communities with their marine and coastal environment.
Recommendation rCONNECT 6: Initiatives are encouraged to supply sustainable aquaculture and fisheries products from the Clyde Marine Region to local shops and restaurants to promote the 'Clyde brand' and enhance experiences for local people and visitors to the Region.	Limited/No additional cost because this is a recommendation and is not a policy; the recommendation *encourages* initiatives. If followed, this recommendation could deliver potential additional benefits associated with supporting the local economy and promoting local, sustainable jobs and industries.
Chapter 9: All sectors – general policy	
Policy SEC 1: Proposals for development and/or use should demonstrate that they have considered: a) Any adverse impacts on the efficient and safe movement or navigation of vessels around the Region, to and from strategic freight hubs, ports, harbours, marinas, moorings and anchorages, including ferry operations are avoided or appropriately mitigated; b) demonstrating operational and/or technical mitigation where a proposals' benefits may outweigh navigational interference; c) the cumulative impacts of the proposal, both within and between sectors where possible; d) alignment with any future sectoral spatial management plans developed by the Scottish Government, the Scottish Environment Protection Agency, Planning Authorities and/or the Clyde Marine Planning Partnership for the relevant sector; e) potential synergies and partnerships with other sectors; f) avoiding, minimising or mitigating any negative impact on other marine users; and g) avoiding any unacceptable burdens on existing infrastructure and services that cannot be resolved.	Limited/No additional costs because this policy synthesises existing sectoral requirements, such as those stated in the NMP (e.g. GEN 15, GEN 21, REC & TOURISM 2 and TRANSPORT 1) and delivers them at a local level. This policy could deliver potential additional benefits, such as making licensing requirements for developers and decision-makers clearer and ensuring cumulative impacts are addressed effectively.
Policy SEC 2: Proposals for development and/or use are encouraged where they: a) provide important supply chain services for marine sectors, b) promote any opportunities for shared use of infrastructure and/or marine spatial area and collaboration between and within sectors, c) improve connectivity around the Clyde Marine Region, for example through multi-modal journey planning and active travel, taking into account different types of activity as well as different types of transport and links to other marine regions, or d) provide social, health & wellbeing and economic benefits to local communities and/or more widely, for example through the regeneration of coastal areas, particularly brownfield sites, and/or the diversification of the rural marine economy.	Limited/No additional costs because this policy *encourages* proposals to consider the measures in the policy. This policy could have potential additional benefits, such as those associated with collaborating between sectors and sharing infrastructure, e.g. reduced/shared costs and improved efficiency and could also benefit the CMR through increased /efficient/diverse connectivity within the region and with other marine regions. There will also be benefits to local communities.
Recommendation rSEC 1: Organisations and marine users should share data, which is not commercially sensitive, related to their activities in the marine and coastal environment to central databases and support open data initiatives to facilitate partnership working and increase knowledge of the Clyde Marine Region.	Limited/No additional costs because this is a recommendation and is not a policy. If followed, this recommendation could deliver potential additional costs associated with quality assurance and sharing of data. There

Policy	Potential impacts – costs/benefits
	are potential additional benefits, such as those associated with reduced costs through effective data sharing, future efficiencies and improved collective understanding of the CMR.
Recommendation rSEC 2: Organisations should communicate with other relevant marine users where possible when they are planning to undertake works, including emergency works, in the Clyde Marine Region.	Limited/No additional cost because this is a recommendation and is not a policy. If followed, this recommendation could deliver potential additional cost to put communication processes in place but there would be potential additional benefits associated with improved stakeholder engagement, and reduced conflict.
Chapter 10: Sea Fisheries	
Policy FISH 1: Proposals for development and/or use should avoid, minimise and/or appropriately mitigate significant adverse impacts: a) on commercial fishing opportunities, taking into account seasonality and the year-round operation of the affected fishery; and b) on nursery, spawning and feeding areas for commercially fished species, and associated habitats and species.	These policies are in-line with the direction of travel indicated in the Scottish Sea Fisheries National Discussion Paper and with various international obligations. Collaborative working should ensure that any additional costs are not solely incurred by fishers. Potential additional benefits are associated with ensuring sustainable fisheries, such as improved resilience within the industry, potential for increased landings as a result of a healthy marine environment and well-managed healthy and productive fish and shellfish stocks, supporting businesses and/or sectors reliant on a healthy marine ecosystem, potential marketing advantage with fully documented fisheries and reputational benefits.
Policy FISH 2: Proposals for development and/or use should consider, where appropriate, the potential for significant adverse impacts on the social, cultural and economic importance of fishing, in particular to fragile communities.	Limited/No additional costs because the WCRIFG already works with the listed stakeholders so this policy is not placing additional requirements on these stakeholders. Funding will be required to deliver scientific research and practical measures whether the CRMP is or is not adopted. Potential additional benefits of supporting businesses and/or sectors which rely on a healthy marine ecosystem, both within the CMR and potentially within Scottish, UK or international marine areas.
Policy FISH 3: The appropriate fishing agencies, organisations and/or fishers that use an area that could be affected by a proposed development should be consulted at an early stage in the site-selection, design and planning process.	Limited/No additional costs because the WCRIFG already works with the listed stakeholders so this policy is not placing additional requirements on these stakeholders.
Recommendation rFISH 1: Commercial fisheries in the Clyde Marine Region should aim to ensure that: a) stock assessments are available for all harvested species, appropriate management measures are in place to work towards a situation where populations of all harvested species are at levels which can produce Maximum Sustainable Yield, particularly through reduced effort/catch of crab and lobster fisheries, and Maximum Sustainable Yield ranges are used where appropriate; b) appropriate spatial and other management measures are in place to protect the most important areas for fisheries and to protect those seabed habitats and species which are sensitive to fishing activity; and	Limited/No additional cost because this is a recommendation and not a policy. However, if followed, potential additional costs associated with completing stock assessments, introducing management measures and implementing Fully Documented Fisheries. However, these recommendations are in-line with the direction of travel indicated in the Scottish Sea Fisheries National Discussion Paper and with various

Policy	Potential impacts – costs/benefits
c) improving technology and fishing practices which will lead to Fully Documented Fisheries with a reduction in bycatch of non-target species, particularly sharks, skates and rays (elasmobranchs).	international obligations. Collaborative working should ensure that any additional costs are not solely incurred by fishers. Potential additional benefits are associated with ensuring sustainable fisheries, such as improved resilience within the industry, potential for increased landings as a result of a healthy marine environment and well-managed healthy and productive fish and shellfish stocks, supporting businesses and/or sectors reliant on a healthy marine ecosystem, potential marketing advantage with fully documented fisheries and reputational benefits.
Recommendation rFISH 2: Scientific research and practical measures to enable fisheries management to contribute to the protection and enhancement of marine ecosystems are encouraged. This includes, but is not limited to: a) studies to consider pressures on harvested stocks such as food web interaction and climate change; b) improved understanding of the habitats and areas that support fisheries including pressure/state relationships and ecosystem role/function; and c) continued monitoring of seabed habitats and species which are sensitive to fishing activity.	Limited/No additional cost because this is a recommendation and not a policy. Also, limited/No additional costs because the WCRIFG already works with the listed stakeholders so this recommendation is not placing additional requirements on these stakeholders. Funding will be required to deliver scientific research and practical measures whether the CRMP is or is not adopted. Potential additional benefits of supporting businesses and/or sectors which rely on a healthy marine ecosystem, both within the CMR and potentially within Scottish, UK or international marine areas.
Recommendation rFISH 3: Fishers should follow the Scottish Entanglement Alliance best practice guidelines to reduce the risk of marine animals becoming entangled in fishing gear.	Limited/No additional costs because this is a recommendation and is not a policy. Fishers may incur additional costs if they follow the recommendation and damage to reputation if they do not follow them, but they may gain potential additional benefits, such as reduced gear loss/damage and improved reputation if they do follow them.
Recommendation rFISH 4: Fishers should follow legislation and best practice guidelines in relation to static gear buoy markings in order to reduce the likelihood of adverse interactions with other marine users.	Limited/No additional costs because this policy is already a requirement through the Marking of Creels (Scotland) Order 2020. Potential additional benefits, such as reduced gear loss/damage.
Chapter 11: Aquaculture	
Policy AQUA 1: Proposals for finfish farming development should have regard to: a) the Technical Standard for open net Finfish Aquaculture and any future Technical Standard for open net, semi-closed or closed systems; and b) the requirements outlined in the mandatory control measures for the live capture of Scottish wild wrasse for salmon farms and any future fisheries management or legislation regarding cleaner fish.	Potential additional costs associated with implementing some of the conditions set out in this policy (conditions (b)). This policy requires them to be implemented. Some conditions are included in the NMP, e.g. AQUACULTURE 12 supports condition (a). Potential additional benefits associated with implementing successful site management actions/initiatives, such as reduced operating costs, and improved reputation.
Policy AQUA 2: Proposals should demonstrate that they have considered site management actions or initiatives to improve sea lice and disease management, and to reduce the risk of fish escapes.	Potential additional costs associated with implementing some of conditions set out in this policy; however, these conditions are already either best practice or voluntary. This policy requires them to be implemented.

Policy	Potential impacts – costs/benefits
Policy AQUA 3: Proposals for mussel farms should be considered where they support delivery of the policy outcomes of NPF4 through policy 32 on aquaculture and are in accordance with the other policies within this Plan.	Limited/No additional costs because this policy supports businesses that will be economically viable in the longer term; this information could provide potential additional benefits to new shellfish businesses, and new endeavours through collaborations of smaller businesses.
Policy AQUA 4: Proposals for seaweed cultivation should have regard to the latest Scottish Government Seaweed Cultivation Policy Statement and any subsequent guidance and/or planning requirements.	Limited/No additional cost because this policy reiterates existing policy/guidance/requirements.
Policy AQUA 5: Proposals should demonstrate that they have considered that there is no artificial nutrient enrichment of the marine environment to aid production.	This policy provides potential additional benefits by ensuring new businesses know that artificial nutrient enrichment is not allowed. Preventing artificial nutrient enrichment will avoid impacts on businesses and/or sectors which rely on a healthy marine ecosystem.
Recommendation rAQUA 1: Initiatives are encouraged by land and homeowners and public authorities to reduce diffuse pollution and point source pollution from entering water bodies, which can negatively impact water quality, particularly within Shellfish Water Protected Areas.	Limited/No additional costs because this is a recommendation and is not a policy. If followed, this recommendation could deliver potential additional costs to land owning businesses and potential additional benefits to shellfish producers as water quality would be improved.
Chapter 12: Sport, Recreation and Tourism	
Policy SRT 1: Proposals for development and/or use relating to sustainable, marine-related sport, recreation and tourism facilities are particularly encouraged where they: a) facilitate multiple use by providing hubs for marine sport, recreation and tourism, b) diversify the sports, recreation and tourism offering, c) demonstrate a link to transport networks in line with active and sustainable travel objectives, d) promote wildlife tourism and/or ecotourism, e) provide an increase in the number and quality of step ashore facilities in the Region, f) provide effective pump out, wash down and waste management facilities for boat users; or g) use mooring systems with low environmental impact, such as Environmentally Friendly Moorings/Advanced Mooring Systems.	Limited/No additional costs because this policy *encourages* sustainable developments. Potential additional benefits associated with the conditions in this policy as they support sustainable sport, recreation and tourism businesses and activities in the CMR.
Policy SRT 2: Proposals should be supported for the introduction, maintenance and improvement of the network of public slipways and shoreside infrastructure, along with supporting facilities where appropriate and where unacceptable adverse impacts on the environment and amenities are avoided, below the Mean High Water Springs, across the Clyde Marine Region.	Limited/No additional costs because this policy expresses support for public slipways and shoreside infrastructure, where appropriate, and it does not include any conditions. However, introducing, maintaining and improving public slipways and shoreside infrastructure requires investment. Potential additional benefits associated with increasing public access, such as increasing visitors which supports local businesses.
Policy SRT 3: National and international sport, recreational and tourism events for all recreational vessels are supported in the Clyde Marine Region. Organisers of such events: a) should undertake a risk assessment to identify likely significant impacts on protected areas and species,	Limited/No additional costs because protected areas and species are protected through other existing legislation, so organisers should carry out (a) and (b) regardless of this policy. It is unlikely that informing the relevant Statutory

Policy	Potential impacts – costs/benefits
b) should collaborate with and seek advice from relevant authorities, (e.g. NatureScot) to acquire licences where needed and to identify and implement appropriate mitigation measures in a timely manner in advance of any event taking place, and c) should inform the relevant Statutory Harbour Authority of the nature and details of the event in a timely manner in advance of the event taking place.	Harbour Authority will impose significant additional costs. Potential additional benefits of raised awareness in the local area of the event, avoidance of conflict with other marine users and avoidance of impacts on businesses and/or sectors reliant on a healthy marine environment.
Recommendation rSRT 1: All wildlife cruise tour operators operating within the CMR should be WiSe scheme certified.	Limited/No additional costs because this is a recommendation and is not a policy. If followed, potential additional costs could be incurred related to completing WiSe training. However, obtaining this certification could also deliver potential additional benefits to tour operators in the CMR by making them more desirable to customers.
Chapter 13: Shipping, Ports, Harbours and Ferries	
Policy SHIP 1: Development(s) and/or activities will be supported that encourage the sustainable growth of the cruise market for ships of around 150 m at appropriate locations, in particular at Dunoon, Rothesay, Helensburgh, Inveraray, Troon, Brodick, Fairlie, Holy Loch, Irvine, Greenock, Ayr, Ardrossan and Hunterston, and where the proposal demonstrates strong links to supporting sustainable tourism, including wildlife tourism, in the local area.	Limited/No additional costs because this policy *encourages* sustainable growth. This policy provides a regional context for policy TRANSPORT 2 in the NMP. However, growing the cruise market requires investment. Potential additional benefits for businesses associated with supporting and growing a sustainable cruise industry, and other businesses benefitting from increased visitors to the CMR.
Policy SHIP 2: Development(s) and/or activities will be supported for the construction, servicing, decommissioning and recycling of large marine structures and vessels at appropriate locations, in particular at Campbeltown, Greenock, Hunterston, Troon, and Ayr, and where the proposal demonstrates a positive impact on the regeneration of local areas.	Limited/No additional costs because this policy expresses support for activities related to large marine structures and vessels. This policy provides a regional context for policy TRANSPORT 2 in the NMP. However, this type of infrastructure development requires significant investment. Potential additional benefits for businesses associated with carrying out the activities listed in the policy.
Policy SHIP 3: Proposals for development and/or use will be supported, particularly where they deliver more sustainable transport, in relation to: a) ferry or related shoreside infrastructure initiatives that improve connectivity to the Kintyre peninsula, the Cowal peninsula and islands of Arran, Bute or the Cumbraes, b) ferry or related shoreside infrastructure initiatives that improve connectivity between the Kintyre peninsula and Northern Ireland, c) infrastructure relating to supporting bulk freight by sea; and/or d) movement connections along, to and across the Clyde estuary.	Limited/No additional costs because this policy expresses support for initiatives that improve connectivity and sustainable transport in the CMR. However, this type of infrastructure development requires significant investment. Potential additional benefits associated with improved connectivity, such as increased efficiencies for businesses and/or sectors.
Policy SHIP 4: Proposals for capital and/or maintenance dredging activities should demonstrate that they have considered practicable and cost-effective environmental enhancement measures, such as beneficial use of dredged material or dredging methods that retain sediment in the natural system, and how these measures will be delivered, where this is practicable.	Limited/No additional costs because this policy is already implemented through Best Practice Environmental Options. Potential additional benefits associated with environmental enhancement measures throughout the Region.
Policy SHIP 5: Proposals for new or upgraded infrastructure related to the powering of vessels, such as shoreside power facilities, or treatment of waste from closed loop exhaust gas cleaning systems or similar, will be supported where the infrastructure proposal demonstrates a long-term contribution to the reduction in greenhouse gas emissions and/or a reduction in pollution from wastewater in the Clyde Marine Region.	Potential additional costs associated with demonstrating that the proposed building or upgrade of infrastructure delivers a long-term contribution to the reduction in greenhouse gas emissions and/or a reduction in pollution from wastewater. However, reducing greenhouse gas emissions is a national

Policy	Potential impacts – costs/benefits
	target and reducing sulphur emissions from vessels is an international requirement. Potential additional benefits associated with supporting national and international requirements and the many benefits associated with reduced greenhouse gas emissions.
Recommendation rSHIP 1: The use of compliant fuel is encouraged in the Clyde Marine Region. If an exhaust gas cleaning system is fitted, it should be used in closed loop mode. Large parts of the navigable Clyde are dredged; therefore, until there is sufficient evidence to be confident that the use of open loop scrubbers will not impact negatively on sediment quality (and hence on the ability to dispose of dredged sediment to sea), open loop scrubbers or hybrid scrubbers in open loop mode should not be used in the Clyde Marine Region. This applies in transit, at berth and at anchorage. The waste from the exhaust gas cleaning system should only be disposed at ports where appropriate reception facilities are available.	Limited/No additional costs because this is a recommendation and is not a policy. Vessels need to comply with the International Maritime Organisation's cap on sulphur. However, using compliant fuel and retrofitting vessels with closed loop scrubbers may be more expensive than using open loop scrubbers. Potential additional benefits associated with limiting/reducing the amount of waste from exhaust gas cleaning systems entering the Region and preventing adverse impacts on sediment quality.
Chapter 14: Energy, Subsea Cables and Pipelines	
Policy ENCA 1: Proposals for development and/or use relating to offshore wind and marine renewable energy, including test facilities, should demonstrate that they have considered that: a) proposals for commercial-scale developments are sited in draft Plan Option areas identified through the Sectoral Marine Plan process (see Map ENCA 1 and further information section below); b) due regard has been paid to relevant factors in the Sectoral Marine Plans and supporting documentation/assessments (as appropriate); c) proposals for small-scale offshore wind developments undertake early and proactive engagement with relevant public authorities and relevant stakeholders; and d) where applicable, detailed infrastructure restoration and maintenance plans are included for the full lifespan of any proposal, including any decommissioning/remediation required.	Limited/No additional costs because this policy lists existing regulations/plans. Developing in the Plan Option areas and following Regional Locational Guidance will likely provide potential additional benefits by reducing costs associated with scoping locations for projects.
Policy ENCA 2: Proposals for developments will only be supported where it can be demonstrated that they contribute to a sustainable, secure and inclusive energy transition, taking account of our Climate Change Policies and in line with statutory marine and land use planning policy, environmental regulations and industry best practice.	Limited/No additional costs because this policy reiterates existing regulations/policy.
Recommendation rENCA 1: The laying, replacement and maintenance of communication and power cables and any oil and gas pipelines is encouraged where: a) existing routes and landing points are used where practicable, and/or b) the required mitigation and monitoring plans are produced.	Limited/No additional costs because this is a recommendation and not a policy and also reiterates existing regulations and best practice.
Chapter 15: Defence	
Recommendation rDEF 1: His Majesty's Naval Base Clyde is encouraged to integrate any increased levels of Ministry of Defence marine activity in the Clyde Marine Region in accordance with this Plan, ensuring wide engagement with other marine users.	Limited/No additional costs because this is a recommendation and not a policy, does not impact on defence activities and is in line with current practice by the Ministry of Defence.
Chapter 16: Marine Aggregates	

Policy	Potential impacts – costs/benefits
Policy AGG 1: Proposals for the extraction of marine aggregates should demonstrate that they have considered: a) providing a description of the alternatives that have been considered, such as alternative sources or materials, including dredged material; and b) demonstrating that marine aggregate extraction is an essential part of the proposed project. Where an Environmental Impact Assessment is required, the proposal should demonstrate that it has considered an assessment of the physical effects of the operation, including any implications for coastal sediment dynamics.	Limited/No additional costs because this policy is in line with the requirements of Best Practice Environmental Options and policy AGGREGATES 2 in the NMP - it provides detail of delivery of the NMP policy at the regional level.

It should be noted that in relation to the recommendations included within the CRMP, there could be reputational risks/benefits to businesses not following/following this guidance.