Coastal Heritage within FCERM
The Challenge of Conflicting Priorities

Summary

Document Information

Project	SCOPAC Coastal Heritage at Risk
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- SCOPAC (Standing Conference on Problems associated with the Coast)
- The Local Government Association Coastal Special Interest Group (LGA SiG).
- Historic England
- The Jurassic Coast World Heritage Site
- English Heritage
- Defence Infrastructure Organization

1. Introduction

This paper highlights the implications of managing heritage assets on the coast in relation to Flood and Coastal Erosion Risk Management (FCERM) schemes and over-stretched local authority maintenance budgets. We fully support the conservation of these assets into the future, and hope by highlighting the scale of the challenge, a more sustainable solution can be found to preserve them for future generations to enjoy. The study underpinning this paper was delivered by Coastal Partners and funded by the Southern and Wessex Regional Flood and Coastal Committees and SCOPAC. It was undertaken with a focus on the central south coast of England, between Lyme Regis and Worthing (Hillawi, 2025), however its findings have implications for national investment and resource allocation with regards to FCERM and Coastal Heritage.

2. Background

The coastal zone contains a legacy of heritage assets, including historic buildings, quay walls and landscapes (both terrestrial and submerged) as well as fragile and irreplaceable archaeological remains and shipwrecks. These play an important role in society, contributing heavily to social, economic, and environmental characteristics of place. It is therefore generally considered vital that the profile of heritage is incorporated into Local Authority decision making and resource allocation. A significant number of these assets have historically benefited from Flood and Coastal Erosion Risk Management Grant in Aid (FCERM GiA) funding. However, defending these assets can divert limited FCERM GiA away from protecting people and property from flooding and erosion. Lack of suitable funding streams, combined with uncertainties surrounding accountability and understanding of responsibility for heritage assets, puts significant pressure on the effective delivery of FCERM, risking both their permanent irretrievable loss or damage and putting communities at increased risk.

Where a historic site sits within a wider FCERM funded scheme, protecting homes and businesses, it is frequently required that heritage conservations and advisories are employed to align with certain licence or planning requirements, in many cases adding considerable extra cost (Figure 1 shows the percentage of planned FCERM schemes along the central south coast region which have designated heritage within their boundaries). However, the benefit and value of doing so is not recognised in the economic case, frequently resulting in a significant funding shortfall. Whilst it is possible to account for some of these costs with adequate risk factored in, this will essentially increase the overall cost of the scheme, lowering the partnership funding score and in some cases, making the scheme unaffordable. A further question remains over those heritage assets that do not sit within a qualifying FCERM GiA scheme regarding who pays for protection or relocation.

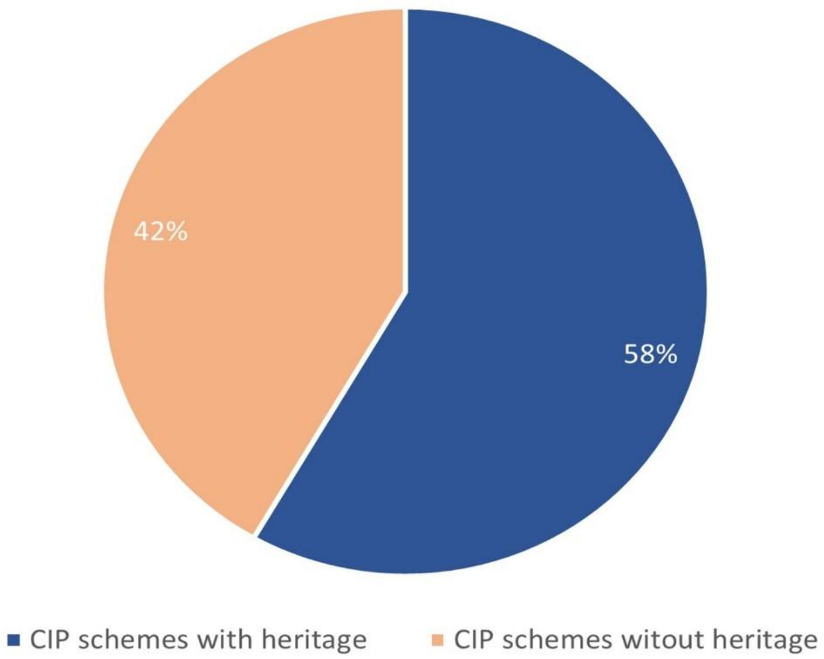

Figure 1. 58% of planned schemes along the central south coast of England (Lyme Regis to Shoreham-by-sea) have designated heritage within their boundaries.

Even if all the correct processes, investigations and mitigations have been carried out, it is still commonplace for previously undocumented assets to become exposed during the construction phase of an approved scheme. Should this occur, significant additional costs may be added to the overall project costs through requirement for further archaeological mitigation and in some cases, design amendments to preserve the asset as considered appropriate. Figure 2a shows an example of archaeology being uncovered as part of works at Southsea Coastal Scheme with Figure 2b showing mitigating design alterations.

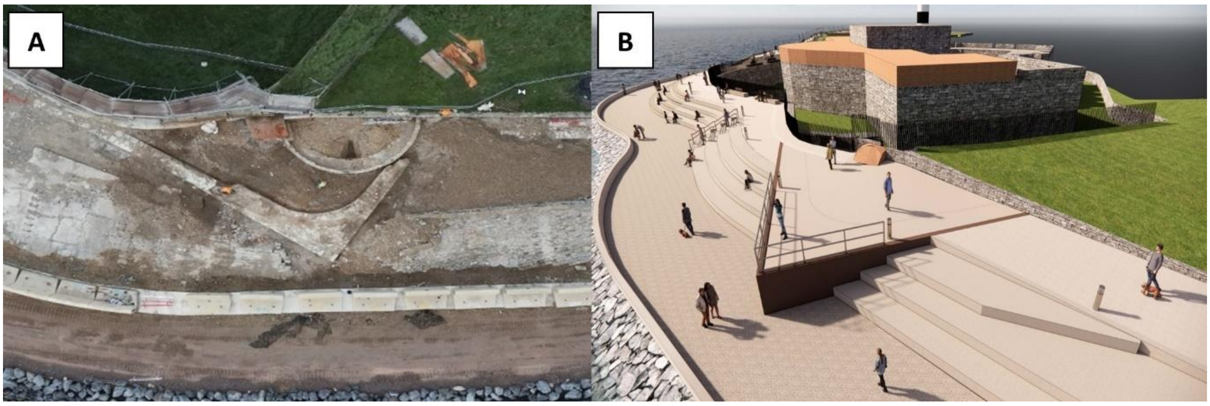

Figure 2a and 2b. The discovery of unknown Archaeology can result in unbudgeted and high-cost design amendments to coastal schemes. The images above show design changes required to accommodate a fortification discovered as part of the Southsea Coastal Scheme during construction.

A significant challenge is presented where heritage assets directly perform a coastal defence function. Many of these are now reaching the end of their lives and are becoming increasingly vulnerable due to pressures associated with climate change. However, the cost of their maintenance is significantly increased by statutory mitigations exerted by their heritage status, a problem which is often further compounded by other complications relating to their general aging nature, lack of appropriate record keeping and conflicting interests between stakeholders. This results in limited Local Authority revenue budgets becoming significantly stretched, reducing affordability, and therefore increasing risk to the communities these assets protect.

3. Local Authority Funding Challenges Associated with Defending Heritage Assets at Coastal Risk.

The UK coastline supports a large number of designated heritage assets which are either currently or imminently at direct risk of loss or damage through flooding or erosion. The present-day construction costs of defending these assets on the south coast alone (Lyme Regis to Shoreham-by-sea) has been estimated to be approximately 1.4 billion (SCOPAC, 2025). Local Authorities overwhelmingly act as a primary landowner for the majority of coastal heritage sites or hold maintainer responsibilities (Figure 3 shows maintainer responsibility of heritage assets at coastal risk for the central south coast region); as such considerable public investment is required to ensure their future management is viable.

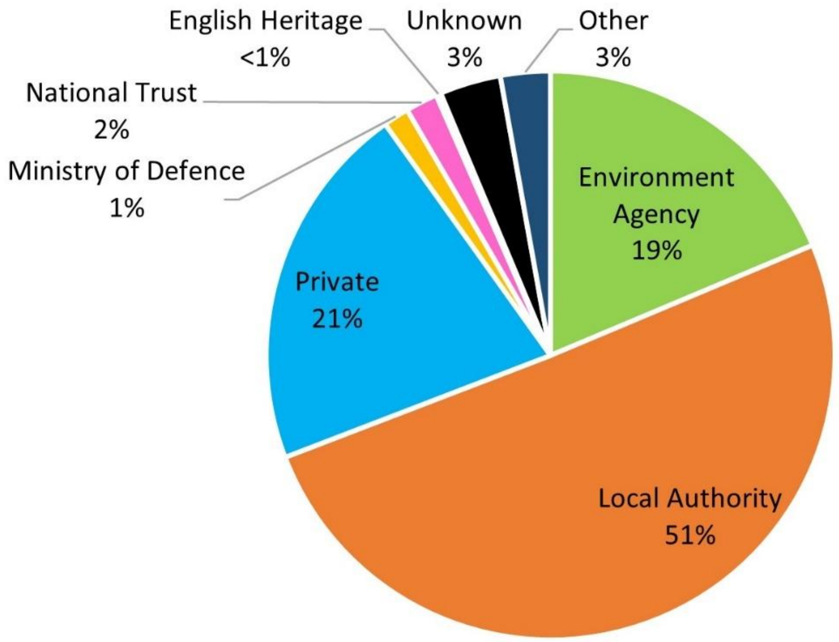

Figure 3. At least 70% of historical assets at risk from coastal erosion and/or flooding along the south coast between Lyme Regis and Worthing are maintained by publicly funded bodies.

However, a review of funding streams has revealed that at present **no funding streams exist to specifically support the costs associated with heritage assets at coastal risk** (SCOPAC, 2025). Sufficient funding must therefore be drawn down either through traditional FCERM funding pathways or acquired through other streams geared up for other (non-FCERM focussed) aspects of heritage conservation, wider regeneration, or other community funding.

However,

- Heritage assets do not qualify for allocation of Flood and Coastal Erosion Risk Management Grant in Aid (FCERM GiA) (the main source of central government funding for coastal flood protection works) in current economic assessments.
- Alternative funding streams are either directly unsuitable, yield insufficient sums or hold considerable uncertainty in their eligibility to contribute to heritage related coastal risk management issues

Due to this funding gap, **defending the coastline on the basis of the presence of Heritage significance alone is at present aspirational and practically unachievable for most sites within the current funding landscape.** With increasing climate pressure, a number of historical assets will become more vulnerable, and it is likely that cost pressures will increase, and the funding deficit be exacerbated.

4. Impacts of the Statutory Consenting Process on FCERM Schemes

National and local planning policy, plus legislation, set requirements for heritage impacts and mitigation regardless of funding available to a scheme. Findings from the SCOPAC (2025) report, identify that 58% of FCERM schemes planned to occur over the next 10 years between Lyme Regis and Shoreham-by-sea contain designated coastal heritage within their boundaries, highlighting the scale of impact this will exert in one UK region alone. The primary vehicle to ensure schemes comply with legislation and priorities pertaining to management of the historic environment is through a statutory consenting process. Engagement with this consenting process results in significant and statutory increases to costs which tend to be challenging to price upfront, resulting in flood defence money (acquired specifically and only for FCERM costs) being spent on heritage, rather than protecting people and property. Key causes of these increased costs are listed as follows;

- Statutory advisories and mitigations which schemes must adhere to including the use of sympathetic construction materials or techniques, input from specialist consultants and changes to the design which can significantly increase the cost and has been known to exceed 20% of the original forecast (SCOPAC, 2025) and could be more for certain schemes. Figure 4 shows gives a general summary of the nature of common advisories.
- Timescales associated with the consenting process can be lengthy and result in large delays to works holding considerable financial risk for projects. This is a particular issue where circumstances result in their extension, such as where advisories which arise from the statutory consenting process conflict with other statutory priorities from governmental bodies other than the Department of Culture Media and Sport (DCMS) bodies such as Department for Environment Food and Agriculture (DEFRA) biodiversity targets. The consenting process is also slow to react when should archaeology be found in a scheme location which can extend timescales considerably.
- There is currently limited enforcement on maintenance of designated assets. Where FCERM schemes are required to remove and reinstall assets to facilitate wider works (such as lamp columns, beach shelters, or memorials) they are obligated to foot the cost of refurbishment regardless of the state of disrepair the assets were allowed to fall into in before the works took place.

Without either adequate funding streams to support statutory costs associated with the consenting process or reform to the approach of the consenting process with respect to FCERM, many FCERM schemes will be rendered unaffordable putting homes and properties at risk, or where possible will be forced to reduce cost impacts by designing protection to exclude heritage structures in order to deliver within their funding allocation, increasing the risk of future heritage loss.

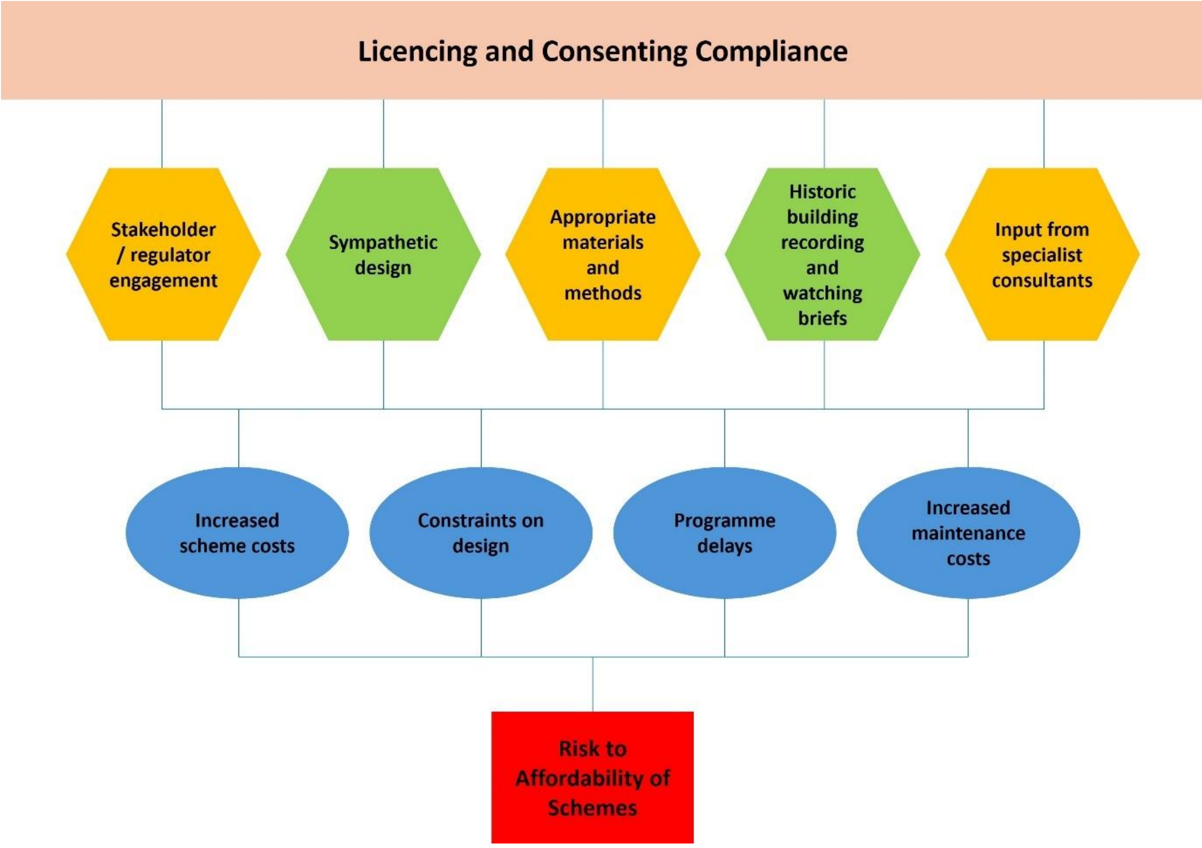

Figure 4. Statutory advisories and mitigations which arise from the consenting process can result in significant costs increases despite not being acknowledged within the current funding criteria placing the affordability and therefore viability of many FCERM schemes at risk.

5. Maintenance Pressures on Heritage Structures which Form a Sea Defence

Significant financial pressure is placed on local authorities by stretches of coastline which are defended by designated heritage structures. Maintenance costs are increased by;

- Statutory requirements to employ heritage sympathetic construction techniques which can be more expensive and increase site time.
- Mandated heritage sympathetic construction materials required frequently carry increased cost and are less robust than their industry counterparts which increase the frequency of required maintenance.
- Where these historic sections of coastline fail (for example due to storm impacts) eliciting the need for quick response emergency works, there is currently no formal provision to expediate the aforementioned consenting process. Therefore, where large scale failures occur, it is a legal directive that the full-length consenting process must be engaged with (including the risk of delays described above in Section 2) resulting in communities and property being placed at immediate risk of flooding and erosion as defences are left to continue to fail until full consents are achieved.

These extra maintenance costs must be soaked up via local authority revenue pots which are already stretched to cover all manner of other local infrastructure priorities, not just FCERM or heritage specifically. Figure 5 shows the general decrease in this funding since 2015. This reduces the affordability of the general maintenance of coastal flood and erosion defences, risking disrepair, and increasing the risk of future failure, flood and erosion risk to communities and the damage or wholescale loss to the heritage assets themselves.

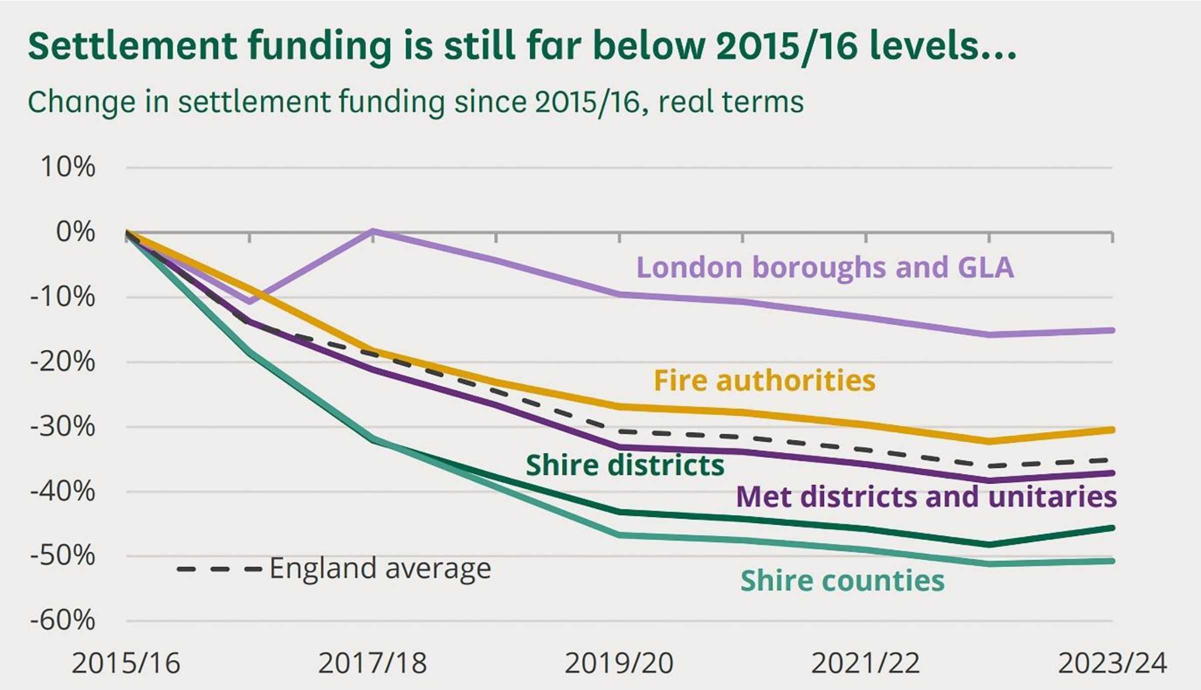

Figure 5. Local authority revenue funds have been falling steadily since 2015. These small budgets can be stretched considerably by the high maintenance requirements exerted by heritage assets which function as sea defences adding to the immense existing pressures (Brian and Sandford,2023).

6. Alternatives to Protecting Heritage Assets from Coastal Erosion and Flooding

Should the additional funding and/or necessary reduction in costs for the coastal protection of heritage outlined above not be achieved, increased loss of heritage sites will become unavoidable. The discourse then must shift to how the impacts of this imminent damage and loss can be minimised and managed in such a way that is least damaging to the socio-economic landscape to which it previously contributed. To achieve this, more adaptive management techniques, approaches and practices will need to be developed and implemented.

7. Conclusion

FCERM has the potential to offer huge benefits to heritage assets, not only through reduced risk of flood and erosion but also through improvements to their appearance and setting. FCERM ensures that historic places and assets can be experienced for generations to come. To nurture these opportunities, consideration needs to be given to how both DEFRA and DCMS can align their objectives and funding mechanisms to ensure multiple benefits are realised. Currently FCERM absorbs the whole cost of these benefits, and in the face of increasing climate pressure and funding scarcity it is a reality that the cost of protecting these valuable heritage assets is becoming increasingly unachievable. Without either additional funding or reform to the statutory obligations imposed on FCERM, it is clear and unavoidable that an increased loss of heritage will occur, and homes, properties and communities will be put at increased risk.

8. Recommendations

This paper puts forward the following recommendations to reduce the impact of issues described above;

- Currently the capacity for FCERM GiA to contribute to the protection of heritage is highly limited. Discussion within DEFRA and the Environment Agency, with input from DCMS and HE is welcomed to ensure the historic environment is considered correctly in FCERM GiA economic cases (the Partnership Funding calculator).
- Historic England are a funding organisation in their own right, however, currently grants appear ineligible to fund or contribute directly to the protection of sites from coastal risk, or to contribute to the funding shortfall exerted on wider FCERM schemes by statutory conservation obligations. It is recommended that the role of DCMS and HE in contributing to the funding of coastal protection for heritage assets become a topic for discussion and review.
- Consideration of the following provisions agreements and guidance to consenting;
    - Increased dialogue between DCMS/HE with other regulating bodies such as DEFRA / EA should occur to reach agreements and form guidance which can guide solutions to scenarios where their respective statutory priorities conflict, expediating discourse on the ground and reducing delays to FCERM/Heritage conservation works.
    - The incorporation of a formal emergency procedure which can expediate the consenting process where failures occur which put homes and properties at direct and immediate risk.
    - DCMS/HE could consider the publication of information and guidance to afford FCERM practitioners a broad awareness of the legislative, technical and historic criterion from which statutory advisories and mitigations arise. This would help FCERM schemes more accurately forecast heritage mitigation costs and constraints earlier in the project lifecycle allowing them to be better incorporated into budgets, business cases and considered from the earliest stages of feasibility/design.
    - DCMS/HE could work with DEFRA and the EA to incorporate a greater awareness of coastal risk and the associated funding constraints as well as raising the profile of FCERM as a heritage conservation activity in its own right. This will help to inform the most economically and technically deliverable mitigations that are appropriately balanced with wider FCERM priorities, reducing the risk of schemes being rendered unaffordable or heritage protection being descoped to preserve the affordability of future schemes.
- DCMS/HE could engage in detailed dialogue and consideration of this as soon as possible in order to develop formal guidance for FCERM regarding the circumstances, manner, costs and funding of implementing these measures and to confirm and outline the legislative framework that underpins it before the adoption of these approaches become directly imminent and unavoidable.

9. Infographic Summary

An infographic summary of key findings conclusions and recommendations of the regional study which underpins this paper can be seen below in Figure 6.

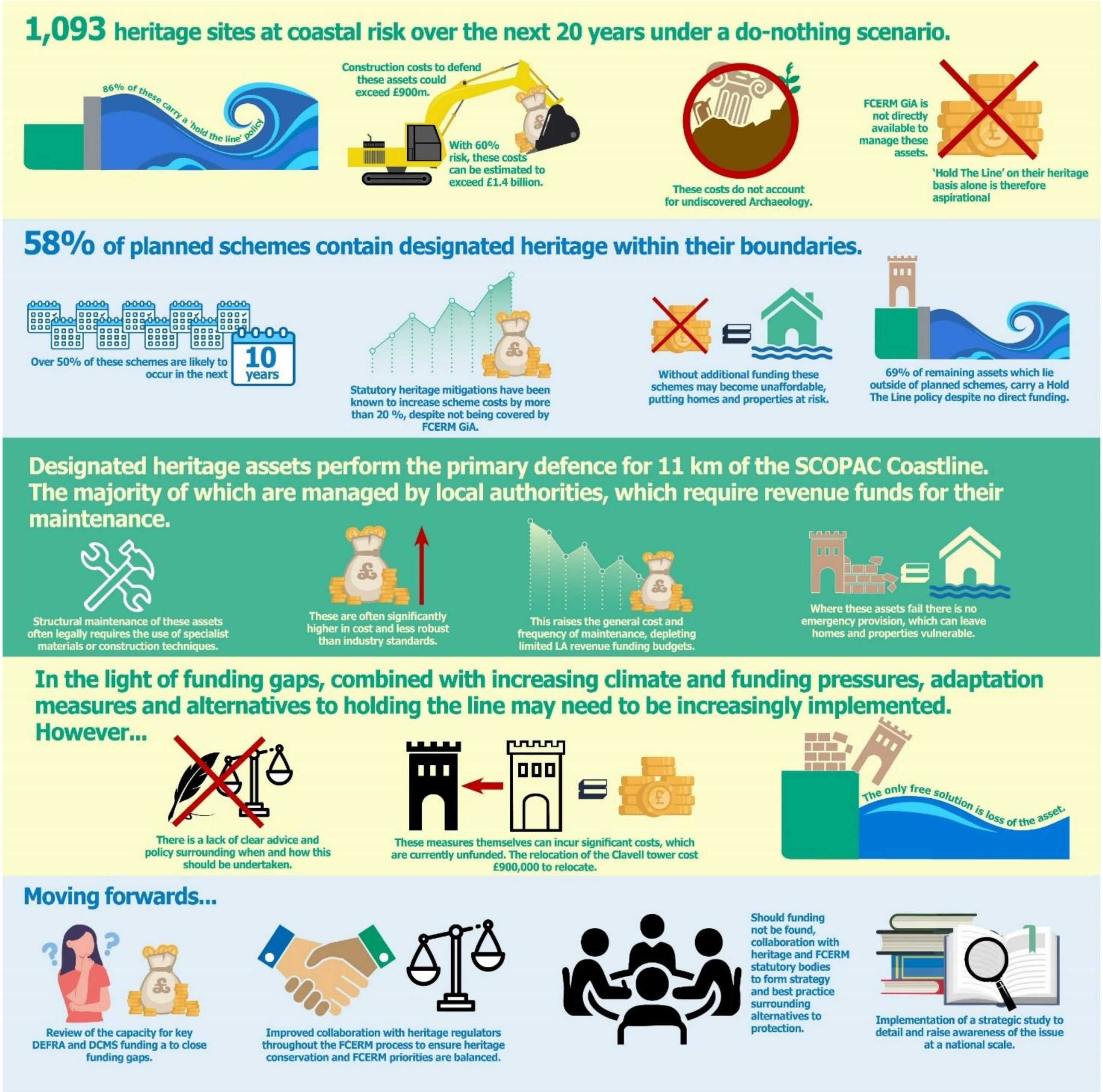

Figure 6. Summary infographic outlining key points and statistics surrounding coastal heritage and FCERM along the Central South coast of England.

10. References

Brian and Sandford, (2023). Local Government Finance Settlement 2023/24. House of Commons Library.

Hillawi. A (2025). Coastal Heritage within FCERM - the Challenge of Conflicting Priorities. Coastal Partners, Havant, United Kingdom. SCOPAC, South Coast, United Kingdom. Unpublished at time of writing.