

**Epsom & Ewell Local Plan Examination**  
**Matter 9:**  
**Retail Policies and Epsom and Town Centre**

**12 September 2025**

**Issue 11: Are the plans policies in relation to retail and Epsom town Centre justified, positively prepared and effective as well as consistent with national policy?**

**Q11.1 What is the need for convenience goods provision within the Borough over the plan period and have sites been allocated to address this need? Representors have commented that the Borough is particularly deficient in this provision. Are these concerns valid?**

- 11.1 The Local Plan has been informed by the Retail and Commercial Leisure Needs Update (RLNA) (2021) (document reference [EV01](#)). The Council has sought a further review of this report to identify whether it remains up-to-date and robust. The findings of the review are attached as Appendix M9a.
- 11.2 The review has found that the conclusions drawn in RLNA remain relevant and up to date with there being “no need to plan for additional convenience and comparison goods floorspace.”
- 11.3 The borough is served by Epsom Town Centre, two local centres: Ewell Village and Stoneleigh, and several neighbourhood parades, which provide a convenience retail function. The locations of these across the borough and can be viewed on the Local Plan Policies Map, including the interactive map (document reference [SD03b](#)). There is strong qualitative range of foodstores in the borough, including a large out of centre Sainsbury’s at Kiln Lane.
- 11.4 The RLNA considered the need for convenience goods floorspace and concluded that the extent and quality of centrally located foodstores in the borough is driving high levels of inflow via car-borne trips and substantial turnover and performance levels. This in turn is driving a higher ‘need’ figure for additional convenience goods floorspace within the borough. Scenario testing considered the needs of just borough residents alongside more sustainable shopping and travel patterns, leading to a much-reduced need for additional floorspace (2,200 sq m net by 2027).

- 11.5 The RLNA concluded that the Sainsbury's at Kiln Lane could, in part, absorb some of this need, rather than it being met through newly delivered floorspace. A new Lidl foodstore opened in August 2021, which whilst factored in as a commitment in the RLNA, is likely to absorb a growing proportion of expenditure as it settles into a more established trading pattern.
- 11.6 Additionally, since the publication of the RLNA (2021), an Aldi foodstore has received planning permission (allowed at appeal in April 2025, Ref: APP/P3610/W/24/3352418). Located outside Epsom Town Centre, in an out-of-centre location, it will provide a foodstore of 1,552 sq m over two floors of which 1,054sq m is net sales area. This will result in a residual need for additional convenience floorspace of approximately 1,150sq m net.
- 11.7 As part of the review of the RLNA (2021) the forecasts for retail need were re-run. The outputs show a small decline in retail need which reinforce the conclusions of the RLNA (2021) (refer to appendix 1 page 23).
- 11.8 Given the findings of the RLNA and the recent review, the borough is not considered to be deficient in convenience good provision and there is no identified need to plan for additional convenience and comparison goods floorspace. The time horizon for these forecasts is the short to medium term (up to 2032), however, they are robust for plan making and will be revisited as part of the next Local Plan review process which must take place at least once every five years in accordance with legislation.

## **Policy S10 Retail Hierarchy and Network**

**Q11.2 This policy identifies the retail hierarchy for the borough. Should this policy also identify the convenience and comparison goods needs over the plan period? If not why not?**

- 11.9 The Local Plan has been informed by the Retail and Commercial Leisure Needs Update (RLNA) (2021) (document reference EV01). The Council has sought a further review of this report to identify whether it remains up-to-date and robust. The findings of the review are attached as Appendix M9a.
- 11.10 The review has found that the conclusions drawn in RLNA remain relevant and up to date with there being "no need to plan for additional convenience and comparison goods floorspace."
- 11.11 The forecasts for convenience and comparison retail need were re-run (refer to Appendix 1's page 23 and 35 to 37 of Appendix M9a with an extract of the findings below. The convenience need forecast is borough wide, whilst the comparison need forecasts are for Epsom Town Centre and the borough's two local centres: Ewell Village and Stoneleigh.

**Convenience Floorspace Need: Economic Update August 2025**

|  | <b>2019</b> | <b>2022</b> | <b>2027</b> | <b>2032</b> |
|--|-------------|-------------|-------------|-------------|
| Capacity for new floorspace (sq.m net)         | 0           | 1,784       | 1,963       | 2,219       |
| Capacity for new floorspace (sq.m net rounded) | 0           | 1,800       | 2,000       | 2,200       |

**Comparison Floorspace Need: Economic Update August 2025****Epsom Town Centre**

|  | <b>2019</b> | <b>2022</b> | <b>2027</b> | <b>2032</b> |
|--|-------------|-------------|-------------|-------------|
| Capacity for new floorspace (sq.m net)         | 0           | -16         | -1,190      | -865        |
| Capacity for new floorspace (sq.m net rounded) | 0           | 0           | -1,200      | -900        |

**Comparison Floorspace Need: Economic Update August 2025****Ewell Village Local Centre**

|  | <b>2019</b> | <b>2022</b> | <b>2027</b> | <b>2032</b> |
|--|-------------|-------------|-------------|-------------|
| Capacity for new floorspace (sq.m net)         | 0           | -260        | -427        | -385        |
| Capacity for new floorspace (sq.m net rounded) | 0           | -300        | -400        | -400        |

**Comparison Floorspace Need: Economic Update August 2025****Stoneleigh Local Centre**

|  | <b>2019</b> | <b>2022</b> | <b>2027</b> | <b>2032</b> |
|--|-------------|-------------|-------------|-------------|
| Capacity for new floorspace (sq.m net)         | 0           | -194        | -423        | -383        |
| Capacity for new floorspace (sq.m net rounded) | 0           | -200        | -400        | -400        |

11.12 The outputs show a small decline in retail need which reinforce the conclusions of the RLNA (2021). There is, therefore, no identified need to plan for additional convenience and comparison goods floorspace.

11.13 As noted in response to Q11.1, the time horizon for these forecasts are in the short to medium term, however they are robust for plan making.

**Q11.3 Paragraph 3.23 of the plan refers to ‘new high density housing development’ within Epsom Town Centre. Should high density be defined within the plan? Where is the evidence base which identifies that the 80dph sought by the Plan will result in high density housing?**

11.14 The Local Plan should be read as a whole and Policy S11 (Design) criterion a requires that new development should make efficient use of land. The supporting text to Policy S11 (para 7.2) makes clear that from major

development in Epsom Town Centre a minimum of 80 dwelling per hectare will be required.

- 11.15 The minimum density was set having regard to the character of the Town Centre which includes extensive heritage assets, including two conservation areas and a significant number of Listed Buildings which is clearly demonstrated in Figure 06 on page 20 of the Epsom Town Centre Masterplan Appendices (document reference HB06a)
- 11.16 There is no maximum density standard applied, and the council will encourage higher density development in appropriate Town Centre locations, such as allocation SA1 (Southern Gas Networks) which benefits from planning consent (subject to a s106) that will deliver a residential led mixed use scheme that deliver approximately 295 dwellings per hectare and the adjoining Hook Road Car Park site that will deliver approximately 300 dwellings per hectare. Other Town Centre sites, have more conservative densities having regard to the findings of the Epsom Town Centre Masterplan.

## **Policy DM20 Community & Cultural Facilities**

### **Q11.4 Are the criteria at part 2 (a-c) of the policy justified and effective?**

- 11.17 The loss of community/cultural facilities can have a negative impact on the health and wellbeing of the borough's residents/visitors and therefore potential losses of such facilities need to be carefully assessed. As such, criteria a to c have been included to ensure robust evidence is provided to justify any loss.
- 11.18 The policy is intended to apply to any type of community/cultural facility and the evidence provided would be expected to be proportionate to the application. The policy is flexible, for example while criteria a) must be complied with, where there is evidence that a facility can be re-provided to an equivalent standard elsewhere or provision can be delivered in a different way, the marketing requirements set out in criteria b) would not apply. The potential loss of an NHS facility could be justified under this policy where it is part of a wider estate re-organisation.

### **Q11.5 Concerns have been expressed regarding the reference within the policy to economic viability. Are these concerns justified?**

- 11.19 Such concerns are not considered to be justified. Where community/cultural facilities are genuinely no longer needed or it can be demonstrated they are not economically viable to retain, the Council would consider a loss of such facilities, subject to the other relevant criteria in policy DM20 being addressed. This is a balanced approach which will ensure facilities needed by the borough's communities are protected.

## Policy S4 Epsom Town Centre

**Q11.6 Will the policy as drafted ensure that the most efficient use of land is achieved within the town centre in accordance with the Framework or could the policy wording be more effective in this regard?**

11.20 Local Plan should be read as a whole and Policy S11 (Design) criterion a requires that new development should make efficient use of land. The supporting text to Policy S11 (para 7.2) makes clear that from major development in Epsom Town Centre a minimum of 80 dwelling per hectare will be required.

11.21 However, we consider the following modification (new / additional text shown in bold) to criteria a of Policy S4 could be made to further emphasise the need to make efficient use of land in Epsom Town Centre for a range of uses.

| Proposed Modification Reference | Policy Paragraph reference  | or Page no. | Proposed Additional Modification. Deleted (strikethrough) and new / additional text (bold)  |
|---------------------------------|-----------------------------|-------------|---|
| MIQ09a                          | <b>Policy S4 criteria a</b> | 31          | Encourage the regeneration of the town centre to deliver high quality development <b>that makes efficient use of land</b> through the redevelopment of the site allocations detailed in this plan and other windfall sites that may come forward in the future. |

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