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**Aylesham Centre,
Rye Lane, London**

(PINS REFS: APP//A5840/W/25/3366760)

Rebuttal Proof of Evidence of
Sasha Gordon (for the
Appellant) on Socio-Economic
Matters

OCTOBER 2025

Q230631

Purpose and scope

- 1.1 This Rebuttal Proof has been prepared by Sasha Gordon and relates to the evidence provided by Jed Holloway (CD 8.15) and Mike Ibbott (CD 8.13), in so far as that evidence relates to socio-economic matters.
- 1.2 For the avoidance of any doubt, I continue to rely upon my Technical Report and the Appellant's other evidence. Where matters raised in Mr Holloway and Mr Ibbott's evidence are not directly addressed in this rebuttal, this should not be taken to be an acceptance of that point.
- 1.3 The matters I intend to cover in this rebuttal are:
- 1.4 From Mr Holloway's evidence:
 - 1.4.1 The matter of displacement of "existing communities particularly vulnerable residents and Peckham's well-established global majority communities", because of housing affordability, as supported by his Appendix 1, and the assertion that, "It is likely that the Proposed Development will increase rents in the area" (CD 8.15 Paragraph 19).
 - 1.4.2 The facts surrounding specialist goods on-site and potential equality impacts (CD 8.15 Paragraphs 55).
 - 1.4.3 The potential equality impacts associated with affordable housing proportion (CD 8.15 Paragraph 68 a-b).
- 1.5 From Mr Ibbott's evidence:
 - 1.5.1 The assertion that "[...] Aylesham Centre and the Market Place, which specialise in West African goods (and increasingly from a wider range of geographical and ethnic backgrounds)" (CD 8.13 Paragraph 6.9).

Displacement of existing communities due to house price inflation

- 1.6 My views on the likelihood of potential displacement are already set out in Paragraphs 4.27-4.42 of my Technical Report and these views are unchanged. I will add specific comments related to the conclusions taken from Mr Holloway's Appendix 1.
- 1.7 Mr Holloway suggests that the development "threatens to displace existing communities." He points to the report provided by Dr Jelali at Appendix 1 indicating that it provides evidence for impact on "housing affordability....concerns about rising housing costs....priced out of the area....."
- 1.8 Appendix 1 of Mr Holloway's Proof provides an appraisal of the potential "impact of regeneration on gentrification." It does not provide an empirical assessment of the impact of development on house prices or rents.

- 1.9 Dr Jelali infers at several points that “regeneration efforts such as the ongoing Aylesham Centre redevelopment” contribute to “rise in house prices” (page 4) but does not provide evidence of this causal link.
- 1.10 Appendix 1 Section 3 (starting on Page 4) provides evidence that house prices in Peckham have increased – and that that increase has been significant. I do not dispute these numbers. But this section fails to provide any evidence that this is linked to new housing development. In fact there is no analysis of causal links at all, nor any comparison between Peckham and any other comparable area to show any specific sensitivity or unique circumstance here. Rising prices do not set Peckham apart from the highly problematic state of London house prices in general – which is driven by high demand and constrained supply, and not by regeneration.
- 1.11 Analysis of causal links between events/changing circumstances and house¹ prices or rents is notoriously challenging because there are so many variables at play - ranging from individual property characteristics to national and international economic influences (interest rates, instability, demographics etc). It is also very challenging to identify a robust counterfactual. While it is challenging, it is essential to acknowledge or attempt to control for these factors or present counterfactuals in order to confirm causality. Dr Jelali’s paper makes no attempt to do either.
- 1.12 The economic analysis referred to in the GLA’s report, “*The affordability impacts of new housing supply: A summary of recent research (CD 6.13)*” (on which I rely in my Technical Report, see paragraphs 4.19-4.27) does attempt to control for these factors. The GLA’s report states at Paragraph 3.1 (my emphasis):
- 1.12.1 A large body of economic research comparing long-term changes in the housing stock with changes in house prices and rents, and **controlling for a range of other causal factors**, shows that increases in housing supply tend to reduce housing costs when **all else is equal**.
- 1.13 My own analysis of Peckham house prices between 2000 and 2025² shows no temporal association between sales of new homes and a general rise in house prices at a local level. Looking at five year rolling periods between 2000-2025³, the periods with the highest new build housing sales are not the same periods with the highest house price increases – in some periods the converse is true. This is not a full regression analysis and I have not controlled for other factors, but this evidence does not point to a significant causal link between new housing development and general house price inflation in Peckham over the period.
- 1.14 I do not dispute that the new homes themselves are generally more expensive than the average by typology and size for any area – that is fully logical in the context of the premium paid to have a home with an up to date policy compliant energy efficiency rating and no additional structural works or refurbishment required. That is not evidence of an impact on the wider housing market. Please refer to the Market Research Note appended to Mr Pascal’s Rebuttal Proof of Evidence for further context on existing local prices and the likely price point

¹ For the avoidance of doubt I use “house prices” as a coverall for houses and flats.

² Based on Land Registry Price Paid Data for 2000-2025 for the SE15 area.

³ i.e. 2000-2004; 2001-2005 etc.

for the proposed homes – showing the new homes will be within the existing local range of comparables. In summary, my concerns with the conclusions of Appendix 1 are:

Conclusion	Analysis of Evidence provided in Appendix 1
Regeneration leads to higher house prices	No statistical control/comparison (e.g. have house prices risen in areas both with and without development?). No counterfactual (e.g. what has happened to house prices in similar areas that have not experienced regeneration?). No acknowledgement that redevelopment of this site is required by adopted Planning Policy.
New housing displaces existing communities	Evidenced by resident concerns and uncertainty, not statistical evidence. No control for other factors and no comparative analysis – as set out above, no analysis of what has happened in other areas with similar characteristics but no development. Important to remember there are no existing homes on-site to be displaced.
Price rises happen after “gentrification” not the other way around.	No analysis of different causation pathways – e.g. no acknowledgement that price increases would be occurring independently of regeneration or that gentrification could be happening independent of regeneration policies or development activities because of wider societal, economic and housing market forces well beyond the local area or the influence of a single land owner or site.

- 1.15 In the event of a house price increase, Mr Holloway’s suggestion that global majority⁴ residents would be “particularly” affected is an overly simplistic view of the local housing market.
- 1.16 Not all local people will be directly affected by local house price dynamics: 50% of local⁵ households live in social rented housing on assured tenancies, among the highest rates of social housing in London, as set out in my Technical Report (Figure 3 page 37). Social rent levels are tightly regulated and while property value is one component of the formula, the overall rate and its level of inflation is capped.
- 1.17 A further 29% of local households own their own home⁶.

⁴ I have used this term to reflect that used by Mr Holloway. I interpret this to mean “people who are not white, considered as a group comprising the majority of the world's population.” as defined by Oxford Languages.

⁵ Peckham and Rye Lane

⁶ Census 2021

- 1.18 66% of households who self-identify as black (based on the ethnicity of the Household Reference Person⁷) live in social housing, and 20% of local black households⁸ own their home.
- 1.19 Private renters are the local people most likely to experience the effects of rising house prices in the short to medium term (directly through their rent and indirectly through their ability to get on the local housing ladder). There are 2,500 local households who rent privately⁹. The majority of private renters locally (55%) self-report¹⁰ as being of white ethnicities (based on HRP)¹¹. 26% of these households have a black HRP.
- 1.20 The evidence and narrative provided by Dr Jelali offers an emotional appeal on the basis of resident uncertainty and concern about change. It is entirely normal for residents to be concerned about change in their area and for these concerns to be heard, but this is not the same as providing evidence of a displacement effect related to development. The forces leading Peckham to change and evolve as it has done over the last 100 years – transport investment, shifting retail habits, housing market forces, demographic change – will continue.
- 1.21 This development will have transformative effects on this Site but when considering the pressures on house price dynamics at a local, London and national level, it will not be the main, or even a significant contributing, factor to change given the scale of the other forces.

Counterfactual

- 1.22 This is an Allocated Site. Southwark *requires* this site to change significantly in its planning policy. There is no development scenario envisaged by that policy in which the site would not change in favour of new transformational development of a high standard. This has been accepted, indeed mandated, by the borough and should form part of any assessment of any robust alternatives.

Equality Impacts related to change in retail: specialist goods

- 1.23 Peckham is home to a wide range of unique or specialist shops. This is fully reported in the EqIA¹² and in the background socio-economic work done in support of the masterplanning. However, both Mr Ibbott's and Mr Holloway's evidence over states this with respect to the tenants of the appeal site, on a purely factual basis.
- 1.24 Mr Ibbott states that: "Aylesham Centre and the Market Place, which specialise in West African goods (and increasingly from a wider range of geographical and ethnic backgrounds)." (Paragraph 6.9).

⁷ "HRP" - So may include other household members who do not identify as black.

⁸ Based on the ethnicity of the Household Reference Person

⁹ As of Census 2021

¹⁰ Census 2021

¹¹ As of 2021 Census including White: English/Welsh/Scottish/Northern Irish/British; White: Irish and other white ethnicities,(based on the ethnicity of the Household Reference Person

¹² Para 3.54 of the EqIA (CD 1.25 and CD 2.27) "*some of the businesses on-site (and many of the businesses in the wider high street) are owned by non-white business owners and/or provide goods or services that meet the specific needs of customers because of their ethnicity.*"

- 1.25 Market Place is a tradename for a commercial F&B tenant which trades as a food hall in six separate locations. This is not to be confused with a traditional market. Market Place is a new tenant of Berkeley's (tenancy commenced in 2023, although the unit has been used as a food hall since 2019). Market Place then licences space to food sellers. We should also clearly state that "Market Place" is a tenant's trading name and should not be confused with an actual market. Keen to make this very clear for the inspector.
- 1.26 Market Place does not specialise in West African goods¹³. One of the nine current licensees (as listed by Market Place) describe themselves as West African¹⁴.
- 1.27 The Handcarts do include some African Stall holders and products (although by no means exclusively). These stall holders are within the scope of the Business Relocation Strategy.
- 1.28 Of the sixteen other leaseholders (as reported in the Business Relocation Strategy (CD 1.9)), none specialise in West African goods and the majority are large national multiples (Greggs, JD Sports etc).
- 1.29 Because I do recognise the specificity of wider retail context and community, I do acknowledge some, very limited, potential for an effect. The EqIA concluded at Para 5.1:
- 1.29.1 "The Development has the potential to have a differential and disproportionate impact on people with certain characteristics such as Race by the loss of existing retail space and displacement of existing businesses. ***These effects are small in the context of the high street as a whole*** and its diverse and specialist retail offer."
- 1.30 The six units listed below, plus the handcarts, equate to roughly 1% of the total retail and leisure floorspace in SE15 4 and SE15 5.
- 1.31 Subject to the outcomes of the Business Relocation Strategy, the Handcart tenants could be successfully relocated locally and the effect would be even smaller.
- 1.32 Berkeley Homes has agreed to a Business Relocation Fund and support to assist handcarts in their relocation elsewhere locally.

¹³ Description of Market Place from their own website: "Dive into an eclectic mix of street food at Market Place Peckham, complete with pool tables, a photobooth, and a dog-friendly vibe. Enjoy Happy Hour deals, Bottomless Lunches, and even free WiFi if you fancy working remotely. Come on Super Sundays for unbeatable draught pint specials—there's always something new to try."

¹⁴ **Annapurna Spice** – South Asian cuisine

Bola Bola Boba – Bubble tea and Asian drinks

Gyros and Fries – Greek street food

Jollof Junction – West African dishes

Little Tokyo – Japanese cuisine

Los Tacos – Mexican street food

Noodle Corner – Asian noodle dishes

Roti Wrap City – Caribbean-inspired wraps

Tianjin Dumplings – Chinese dumplings and fried rice

- 1.33 In addition to the fund, Berkeley Homes will also offer the below a right to return. This includes preferential lease terms, including a discount to market value, to help ensure that units in the competed development are affordable to existing occupiers.
- 1.33.1 Duses Shoes (Unit 2)
 - 1.33.2 Wing Tai (Unit 11A)
 - 1.33.3 PAK Butchers (Unit 14)
 - 1.33.4 Just For You Fashion (Unit 15B)
 - 1.33.5 Factory Outlet (Unit 16)
 - 1.33.6 Image (Unit 17)
- 1.34 Note that the Officers' report (CD 3.1) states the following, which I agree with, at Paragraph 146:
- 1.34.1 "There are a number of similar shops and services nearby, including an oriental grocery shop at 47 Peckham High Street, a shop selling Chinese medicines at 86 Peckham High Street, halal butchers along Rye Lane and African textiles and dress makers along Rye Lane and within Peckham market. A concern has been raised during public consultation on the application that the closure of the Aylesham Centre would result in the loss of affordable food options. However, there are considered to be a number of similar options available near to the site, including along Rye Lane."
- 1.35 In the context of the site allocation mandating redevelopment of the site, the scale of other public benefits (as set out in my Technical Report and the Proof of Mr Alston), and the range of other similar shops and services available elsewhere on the high street, I stand by my view that the public benefits outweigh this potential for adverse effects and this development complements rather than detracting from the existing offer.
- 1.36 Note that the separate EqlA in support of the local plan allocations in Peckham (CD 6.12) specifically lists: improvements to public realm; new walking and cycling infrastructure; and town centre improvements as positive equality effects.

Public Sector Equality Duty

- 1.37 In para 65-69 of his Proof of Evidence, Mr Holloway outlines his concerns with respect to the Public Sector Equality Duty.
- 1.38 He states that, "The EqlA does not provide a sufficient basis for the Inspector to satisfy the public sector duty". I would reiterate what Mr Holloway acknowledges himself – that the duty is on the Inspector and not the appellant (Para 66), and that an EqlA is not required by The Equality Act 2010.

- 1.39 The Inspector can and should take account of all the relevant information available, including but not limited to the EqIA and the relevant sections of the Officers' Report when taking his decision.
- 1.40 The change in the affordable housing offer from 35% to 12% triggered an addendum to the EqIA. I did not assess this as a "harm". I agree that it is a reduction in the scale of the potential benefit, but that is not the same as a harm, and the development would still contribute a positive increase in affordable housing available in the area. The positive statements about affordable housing, accessible housing etc all still apply to the lower amount of affordable housing as I did not quantify these, and the benefits about housing in general (of which there are many) still stand. Note that the 35% development was never approved – I was not in a position where I was required to be comparing an approved development against an amendment.
- 1.41 Officers conclude (at Para 173 of the Officers' Report):
- 1.41.1 "Officers consider that further commitments should be secured to support for the independent businesses on the site as outlined above, in order to safeguard and promote the objectives protected by s.149 of the Equality Act as far as reasonably possible. It is however, considered that these matters could be secured by way of a planning obligation and officers would seek to secure this in the event that planning permission is granted on appeal".
- 1.42 Accordingly, The Draft Section 106 Agreement includes further detail of the Business Relocation Strategy and clauses related to provision of Community Land Trust homes and to multiple review mechanisms to increase affordable housing subject to viability testing.