
Appeal Decision

Site visit made on 11 December 2025

by **S F Murphy BSc (Hons) MSc MRTPI MISEP CEnv.**

an Inspector appointed by the Secretary of State

Decision date: 06 January 2026

Appeal Ref: APP/Y9507/W/25/3366969

Matchbox Stable, A286 Town Lane To The Grove, Singleton, West Sussex PO18 0EX

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission
 - The appeal is made by St Wilfrids Hospice (South Coast) Ltd against the decision of the South Downs National Park Authority
 - The application ref is SDNP/25/00640/FUL
 - The development proposed is a change of use of Matchbox Stables annex from holiday/ tourist accommodation to residential annex for use in association with Old Cottage
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Decision

1. The appeal is dismissed.

Application for costs

2. An application for costs was made by St Wilfrids Hospice (South Coast) Ltd against the South Downs National Park Authority. This application is the subject of a separate Decision.

Main Issue

3. The main issue is the effect of the proposed development on the availability of holiday/ tourist accommodation in the South Downs National Park (SDNP).

Reasons

4. Matchbox Stable sits at the junction of the A286 and Charlton Road within the village of Singleton within the SDNP and the Singleton Conservation Area. Matchbox Stables sits in a courtyard setting adjacent to Old Cottage, a Grade II listed building, alongside a building that provides storage and garages. Matchbox Stables is single storey constructed of brick and flint with a slate roof and some timber weatherboarding and contains a bedroom, reception room, bathroom and kitchen. Whilst its previous use had been a stable and then a granny annexe, its current lawful use is that of holiday/ tourist accommodation.
5. The proposed change of use does not propose to alter the external appearance of Matchbox Stables or the external arrangements for car parking. The appellant states Matchbox Stables has not been in use as holiday/ tourist accommodation for several years.
6. Policy SD23 of the South Downs Local Plan adopted July 2019 (the Local Plan) seeks to provide sustainable and responsible delivery of tourism. Where proposals would result in the loss of visitor accommodation, sub paragraph 2 of Policy SD23

requires the submission of evidence that the current use is financially unviable with a marketing campaign having been undertaken for a period of 12 months to demonstrate no market demand for the existing use or an equivalent tourism use. Appendix 3 of the Local Plan supports Policy SD23 and provides further details of the expected marketing requirements.

7. Marketing information in the form of sale particulars alongside correspondence from the estate agent has been provided to demonstrate a marketing period of 12 months. The appellant has provided a list of viewings that took place during 2024 and has stated that viewings ceased once the property went under offer. However, I have noted the marketing materials submitted detail Matchbox Stables as additional accommodation and as an annexe. No evidence has been provided demonstrating that Matchbox Stables was marketed as its lawful use, holiday/ tourist accommodation. Furthermore, not having ongoing viewings whilst a property is under offer may well be reasonable, this does not justify the position of why Matchbox Stables was not marketed as a holiday/ tourist let as its lawful planning use. Consequently, the market for this use has not been tested.
8. Whilst I acknowledge the caveat on the marketing information concerning the checking of various permissions and leases, I do not consider this sufficiently identifies Matchbox Stables as being holiday/ tourist accommodation and therefore being of a different lawful use to Old Cottage.
9. The appellant states the unviability of the holiday let is demonstrated by a lack of interest by potential purchasers and anecdotal evidence mortgage lenders are averse to lending on the holiday/ tourist accommodation. I have been presented with no evidence that the holiday/ tourist accommodation itself would run, or has historically run, at a loss and therefore would be financially unviable. I further note no evidence has been submitted in the form of a log or correspondence confirming why prospective purchasers did not pursue an interest in Matchbox Cottage.
10. With regard to sub paragraph 2 b) of Policy SD23, given the size, location and design of Matchbox Stables, I am of the opinion the current holiday/ tourist accommodation use assimilates with both its immediate and wider surroundings. As such, I am content it does not harm the special qualities of the SDNP.
11. The appellant has suggested Policy SD23 of the Local Plan could be considered out of date given the Local Plan is older than five years. I recognise the Local Plan is six and a half years old. However, I do not consider the policy conflicts with the NPPF and therefore I am satisfied the policy remains relevant for this decision. Furthermore, I consider the requirements of evidence of marketing the holiday/ tourist use for sale alongside details of finances set out in Policy SD23 and Appendix 3 a sensible and practical means to test the viability of the use.
12. Therefore, whilst marketing details have been provided in support of the appeal, I do not consider the details adequately address the marketing requirements set out in Appendix 3. Furthermore, I am not persuaded that Matchbox Stables was marketed based on its current lawful use as holiday/ tourist accommodation and I am not reassured that sufficient evidence has been demonstrated that the holiday/ tourist accommodation use is financially unviable. Consequently, I do not consider the proposal meets the requirements of Policy SD23 sub paragraph 2 of the Local Plan.

13. I have noted the parish council's and the economic development officer's comments on the planning application including that the proposal would individually have a small-scale impact upon the supply of visitor accommodation within the district. However, I do not consider these material considerations demonstrably outweigh the requirements of the development plan and the lack of evidence that the property was marketed as a tourist/ holiday accommodation use. I do acknowledge the appellants suggestion that friends and family visiting Old Cottage could use Matchbox Stables providing similar benefits to holiday accommodation. However, managing and monitoring such a benefit would be imprecise and problematical.

Other Matters

14. Section 66(1) of the LBCA requires the decision maker, when considering development proposals which affect a listed building or its setting, to have special regard to the desirability of preserving the building or its setting. Additionally, Section 72(1) of the LBCA requires special attention to be paid to preserving or enhancing the character or appearance of conservation areas. Paragraph 212 of the National Planning Policy Framework (NPPF) requires great weight to be attributed to the conservation of a heritage asset irrespective of the degree of harm. Given no external alterations to Matchbox Cottage are proposed and that the residential use would have similar characteristics to the use as holiday/ tourist accommodation, I am satisfied the proposal would have no harm to the setting of the listed building, and the character and appearance of the conservation area would be preserved.
15. Given the appeal site's location within the SDNP, I have a duty under Section 11A(2) of the National Parks and Access to the Countryside Act 1949 to seek to further the purposes of a) conserving and enhancing natural beauty, wildlife and cultural heritage, and b) promoting opportunities for the understanding and enjoyment of their special qualities by the public. As no external alterations are proposed I am satisfied the proposal would not conflict with the first purpose. Regarding the second purpose, as no evidence has been placed before me demonstrating that, following marketing of the holiday/ tourist accommodation use there is no interest and that it is not financially viable, I am unable to be satisfied there would be no conflict.

Conclusion

16. For the reasons given above I conclude that the appeal should be dismissed.

S F Murphy

INSPECTOR