

ACS Response – Sunday Openings in Belfast

1. What sector do you operate in or are associated with?

Retail

2. What size of business do you represent or are you associated with?

Small shop (less than 3000 sq ft)

3. Under current legislation, you can currently open at any time (on Sundays) without restrictions? Are you aware of this?

Yes.

4. Would you see the extension of opening hours on Sunday as positive or negative?

Negative

Please explain your answer:

ACS (the Association of Convenience Stores) does not support the extension of Sunday trading hours and urges the Council to retain the current trading framework. Our position is consistent with our [2017 submission](#) and our October 2024 response (with Retail NI) to the proposed pilot scheme.

1) There is no clear consumer access problem to solve

Stores under 280 sqm – including most convenience retailers – are already free to set their own opening hours on Sundays and routinely trade in the morning. Consumers who wish to access groceries, newspapers, household essentials or hospitality on a Sunday morning can already do so. The proposal does not address an unmet consumer need; it changes which type of store is permitted to be open.

2) The proposal primarily benefits larger stores and risks displacing trade

Extending Sunday morning trading would predominantly benefit larger supermarkets and out-of-town retailers, which would gain up to five additional trading hours each Sunday. Evidence from temporary extensions of trading hours elsewhere in the UK shows independent retailers consistently lose trade when forced to compete with larger outlets on Sundays (Oxford Economics, 2015). Public and worker support for the current framework also remains strong: 66% of UK consumers favour the existing rules (Yonder, 2023) and 91% of shop workers oppose longer Sunday hours (USDAW, 2020).

3) A citywide proposal that goes beyond the stated rationale

The consultation rationale focuses heavily on Belfast city centre – footfall, hospitality demand, hotel occupancy, St George's Market, and the family-friendly city centre ambition. The proposed designation, however, applies across the entire Belfast City Council area, including suburban districts where large supermarkets – not city centre attractions – would be the principal beneficiaries. There is a significant mismatch between the stated objectives and the geographic scope of what is being proposed.

4) Sunday trading reform has not been shown to support high street or city centre regeneration

No recent major review of high streets has identified Sunday trading hours as a barrier to vitality or regeneration. The House of Lords Built Environment Committee report *High*

Streets: Life beyond retail? (November 2024), and the UK Government's response (February 2025), focus on business rates reform, planning policy, public realm, transport access, anchor public services and town centre management – not Sunday trading. The Northern Ireland Executive's *Delivering a 21st Century High Street* (2022) makes no mention of Sunday trading. The Federation of Small Businesses' *The Future of the High Street* (August 2024) does not identify it as a priority either.

5) Changing hours does not create new spending – it shifts when and where it takes place

Household budgets are not increased by extending opening hours. Allowing larger stores to open earlier on Sundays does not generate additional consumer spending; it redirects existing spending away from smaller retailers and from other trading periods. The likely outcome is reduced trade for independent shops without any net benefit to the wider city economy.

6) An unwelcome distraction from the real issues

The substantive challenges facing Belfast's retail and hospitality sectors – business rates, retail crime, energy costs, vacant units, and accessibility for visitors and residents – are well documented and remain the priorities for high street regeneration. We urge the Council to focus on these issues rather than on legislative change that would primarily benefit large out-of-town operators at the expense of independent retailers and shop workers.