

<b>Title of Report:</b>	<b>The Shops (Sunday Trading etc) (N.I.) Order 1997 – Request to designate towns as ‘holiday resorts’</b>
<b>Committee Report Submitted To:</b>	<b>Environmental Services Committee</b>
<b>Date of Meeting:</b>	<b>8<sup>th</sup> April 2025</b>
<b>For Decision or For Information</b>	<b>For Decision</b>
<b>To be discussed In Committee</b>	<b>NO</b>

<b>Linkage to Council Strategy (2021-25)</b>	
Strategic Theme	Local Economy
Outcome	Implementation of statutory requirements
Lead Officer	Head of Health & Built Environment

<b>Estimated Timescale for Completion</b>	
Date to be Completed	N/A

<b>Budgetary Considerations</b>	
Cost of Proposal	N/A
Included in Current Year Estimates	N/A
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

<b>Legal Considerations</b>	
Input of Legal Services Required	<b>NO</b>
Legal Opinion Obtained	<b>NO</b>

<b>Screening Requirements</b>	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals		
Section 75 Screening	Screening Completed:	<del>Yes</del> /No N/A	Date:
	EQIA Required and Completed:	<del>Yes</del> /No N/A	Date:
Rural Needs Assessment (RNA)	Screening Completed	<del>Yes</del> /No N/A	Date:
	RNA Required and Completed:	<del>Yes</del> /No N/A	Date:
Data Protection Impact Assessment (DPIA)	Screening Completed:	<del>Yes</del> /No N/A	Date:
	DPIA Required and Completed:	<del>Yes</del> /No N/A	Date:

## **1.0 Purpose of Paper**

The purpose of this paper is to seek a decision from members following a request from a large supermarket retailer to designate two towns in the Borough as “holiday resorts” under the Shops (Sunday Trading etc) (Northern Ireland) Order 1997 in order to avail of longer opening hours.

## **2.0 Background**

- 2.1 Council received a request from a large supermarket retailer (LIDL) to consider designating Coleraine and Ballymoney as “holiday resorts” in order to avail of longer Sunday opening hours (appendix 1).
- 2.2 Article 6 of the Shops (Sunday Trading etc) (Northern Ireland) Order 1997 allows District Councils, by resolution, to designate any area within its district as a ‘holiday resort’.
- 2.3 In a designated ‘holiday resort’ area, large shops with a shop floor area exceeding 280 m<sup>2</sup> may open at any time on up to 18 Sundays (excluding Easter Sunday) between 1<sup>st</sup> March and 30<sup>th</sup> September each year. The designation exempts these large shops from the restricted Sunday trading hours of 1pm to 6pm on those 18 occasions.
- 2.4 Before making a designation a Council must first consult persons likely to be affected by the proposed designation. Further to ES 240611 and CM240627 Council decided to hold a public consultation on whether to progress the procedure to designate Coleraine and Ballymoney as ‘holiday resorts’.

## **3.0 Previous considerations**

- 3.1 Council have designated Portrush, Portstewart and Ballycastle as ‘holidays resorts’ under the above legislation
- 3.2 Further to ES 210608 a similar request to allow longer opening hours for businesses in Coleraine was proposed. The matter was considered, and the proposal was not seconded.

## **4.0 Consultation**

- 4.1 A consultation exercise was carried out to gather a broad range of views to inform Council’s decision-making process and involved the following steps:
  - A public notice was published in the local press outlining the proposal and inviting feedback.
  - Letters were sent to local retailers located near relevant stores within applicable postcode areas.

- Letters were sent to places of worship located near relevant stores within applicable postcode areas.
- Notices and press releases were shared through the Council's official media platforms, including social media channels. These were subsequently reported by several media outlets including Explore Causeway and Causeway Coast Community Facebook pages as well as BBC News NI.
- The consultation notice was featured in the Council's Business E-Zine, which is distributed to approximately 1,500 businesses, ensuring the proposal reached a broad business audience.
- Relevant trade unions representing retail employees, including USDAW (Union of Shop, Distributive and Allied Workers), were contacted directly to gather input on behalf of affected employees.
- Employees of each LIDL store potentially impacted by the proposal were also informed and provided with the opportunity to share their views.

## **5.0 Consultation responses**

5.1 All consultation responses are attached as Appendices 2, 3 & 4 and can be summarised as follows:

### **5.2 Responses supporting the proposal (Appendix 2)**

- Two responses were received in favour of the proposal.

### **5.3 Responses opposing the proposal (Appendix 3)**

- Fifteen responses from private individuals.
- Letter from Member of Parliament
- Joint letter of objection signed by CEO Retail NI, USAWD (Union for retail workers), CEO Causeway Chamber, CEO Coleraine BID and the Chair Ballymoney Chamber

### **5.4 Survey by Council's Town and Village Manager (Appendix 4)**

- 9 responses received from Ballymoney Town Centre Forums – 78% opposed, 22% in favour.
- 10 responses received from Coleraine Town Team - 50% opposed, 50% in favour.

## **6.0 Recommendation**

It is recommended that Committee make a recommendation to Council on whether to designate, by resolution, Coleraine and Ballymoney as 'holiday resorts' under the Shops (Sunday Trading etc) (Northern Ireland) Order 1997.



David Jackson  
Chief Executive  
Causeway, Coast and Glens Council  
66 Portstewart Road  
Coleraine  
BT52 1EY

9<sup>th</sup> May 2024

**Re: Extended Sunday Opening Hours**

Dear David

I hope this letter finds you well. On behalf of Lidl Northern Ireland, I am writing to express our gratitude for the support and cooperation we received from Causeway, Coast and Glens Council, particularly regarding the extension of Sunday opening hours during the Covid-19 pandemic.

The flexibility provided by extended Sunday opening hours was invaluable in meeting the needs of our customers and communities, especially during that challenging time. We deeply appreciated the opportunity to serve our customers beyond traditional operating hours, enhancing accessibility and convenience for all.

Recognising the positive impact of extended Sunday opening hours in 'seasonal towns', we believe that there is an opportunity to further extend this benefit to communities across Northern Ireland. Expanding the initiative to a wider network of stores would support local economies by promoting increased footfall and economic activity during summer months. We understand that legislation gives Councils the authority to assign as many 'seasonal towns' as they wish, and we feel that the status of the below should be considered further:

- Lidl Ballymoney, Meeting House Street, Ballymoney, BT53 6JN
- Lidl Coleraine, 2 Riverside Park, Coleraine, BT51 3AW

We respectfully request that Causeway, Coast and Glens Council consider our proposal and explore the possibility of expanding the number of stores benefiting from extended Sunday opening hours.

We are committed to working closely to address any concerns and ensure a smooth and successful expansion of this initiative. Thank you for your attention to this matter. We look forward to the opportunity to discuss this proposal further and to the potential positive impact it could have on communities across Northern Ireland.

Property Director

Regional Managing Director

**Lidl Northern Ireland Limited**

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Bank Details: Commerzbank AG, Stuttgart. BIC: COBADEFFXXX, IBAN: DE55 6004 0071 0522 9240 00 (EUR)  
Commerzbank London. BIC: COBAGB2X, IBAN: GB20 COBA 4062 0130 7451 50 (GBP)

## Appendix 2

### Sunday Trading Supportive comments

I'd like to support holiday resort status for Coleraine and Ballymoney because the current Sunday trading is outdated and frustrating for everyone. I actually support a law change to allow all businesses to open whenever they choose too and offer services on a modern non restricted basis. But if this is the best we get which to me is nothing more than a workaround then I'll have to support it.

We shouldn't have these outdated laws in Northern Ireland.

Thank you

[REDACTED]

Dear [REDACTED]

In response to your letter Re: Sunday Trading Consultation, proposing Coleraine & Ballymoney as Holiday resorts,

Harry Corry Ltd are in favour of the proposal.

Yours faithfully

[REDACTED]

[REDACTED]

Harry Corry Ltd

## Sunday Trading Opposition Comments

### 1 Good Morning

My husband [REDACTED] and I would not be supportive of Sunday opening in relation to giving Coleraine and Ballymoney Holiday Resort Status. We freely admit that our Christian belief is that the Ten Commandments still hold as a guide to what is best for humanity, and the keeping of the Sabbath Day, free from work is one of the central commands.

In addition, it would seem odd to connect the status of Holiday resort to either town: firstly, we have little leisure/shopping pursuits to offer residents, never mind holiday makers.

Secondly, because people are on holidays it does not mean that they require to purchase more especially foodstuffs on a Sunday - only those who commence their break in a caravan/apartment on the Sunday might be in need of stocking up that day. Most of us on holidays are enjoying ourselves too much to have a set day for a big shop. In fact, the corner shop would be the go-to place for a pint of milk and some bread, not Asda etc.

Thank you for the opportunity to make local opinions heard.

[REDACTED]

### 2. Good morning,

I wish to express my opposition to the above proposal.

- Coleraine & Ballymoney are not holiday towns. This appears only to be about exploiting a loop hole.
- This only serves the supermarkets. Any additional business they take in on Sunday mornings will only take away from local retailers.
- I assume that the workers in these supermarkets are not jumping at the opportunity to work more hours over the weekend.

Has there been any interest from independent local businesses in Coleraine and Ballymoney for this consultation or is it purely driven by the large multinational retailers?

Also, I would appreciate it if more effort was made to inform the public about this, such as through Social media advertising. I only heard about it from a colleague who watched the news last night. I, and many others like me, haven't watched the news in 15 years.

I am keen to hear the proposed benefits of this proposal.

I look forward to hearing from you.

Kind regards

[REDACTED]

**3. From:** [REDACTED] >

**Sent:** 10 February 2025 20:28

**To:** [REDACTED] >; environmentalhealth  
<[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

**Subject:** Re: Re consultation on designation of Coleraine & Ballymoney as holiday resorts

I can't see it of being any benefit to these towns.. extra staffing costs, extra electricity I'm sure folk working 6 days won't be that fussed getting the one day off wrecked. I honestly don't see the merit in it, apart from the fact that we are apparently living in a credit crisis who has any more money to spend?

**From:** [REDACTED] >

**Sent:** 10 February 2025 20:20

**To:** environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

**Subject:** Extended trading for ballymoney and coleraine

4. Hi

I am against Ballymoney and Coleraine being classed as holiday towns as they are not , so Sunday trading can be extended using this loophole. Sunday is Gods day of rest ,not more of the same as every other day of business.Furthermore Employees need their time off with their families, not extra unnecessary work.

I personally have no objection to Sunday shop opening per se but the notion that the towns of Coleraine and Ballymoney may be considered suitable for designation as holiday resorts is frankly ridiculous.

People with their own vehicles can already access the shops in the seaside towns were they so minded but for those reliant on public transport Sunday services are much diminished so there is no benefit for the more rural parts of the council area, and Limavady doesn't feature at all.

I suppose the shops in Bushmills are multiple but fairly small hence its absence too

(To paraphrase from "Flower of Scotland" - "and sent them homewards tae think again")

**5. From:** [REDACTED] >

**Sent:** 10 February 2025 19:20

**To:** environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

**Subject:** Consultation on the designation of Coleraine and Ballymoney as holiday resorts

To whom it may concern,

As a resident of Coleraine I would like to submit my views on this consultation.

It is totally inappropriate to describe either Coleraine or Ballymoney as holiday destinations.

Coleraine may be the gateway to the North Coast but it cannot be described as a holiday destination in itself.

The larger shops have more than enough hours to trade without extending them any further.

Staff who wish to attend worship on Sunday mornings may feel that they cannot refuse to work for fear of hindering their career prospects.

As a society we are busier and busier with every year that passes, we also have more severe mental health issues than ever before as people have very little time to relax.

I feel to make this change would increase our busyness and ultimately be detrimental to workers and families who have little enough time to spend together.

I look forward to hearing the outcome of the consultation.

Regards,

[REDACTED]

6. Dear Sir/ Madam,

**Re: Consultation on the designation of Coleraine and Ballymoney as holiday resorts  
The Shops (Sunday Trading) (Northern Ireland) Order 1997**

Considering the Council's website says the representatives of local residents will be consulted before any decision on the above matter, I am surprised and disappointed, as the MP for Ballymoney, not to have been so consulted!

Nonetheless, I wish to record my opposition on behalf of residents and smaller traders to the above proposition. As the President of Ballymoney's Chamber of Commerce has said this is a proposal designed to help larger shops.

I agree with [REDACTED], Chief Executive of Retail, "This is not about tourism, this is about the large supermarkets trying to exploit a loophole in the legislation."

Moreover, it wholly disregards the interests of shop workers and their families.

I strongly believe the Council should be doing more to protect the independent retailers in our towns, not disadvantaging them by these proposals.

Accordingly, I trust this wrong-headed proposal will be abandoned.

Yours faithfully,



[REDACTED]

7. From: [REDACTED] >

Sent: 02 March 2025 15:38

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Subject: Consultation on the designation of Coleraine and Ballymoney as holiday resorts

Dear Councillors

I write to you as a resident ([REDACTED]) and as a person likely to be affected by the proposed designation of Coleraine as a holiday resort.

I wish to object to this proposal for the following reasons.

1. Coleraine is obviously not a holiday resort
2. This is a blatant attempt by large stores to exploit a loophole in the law.
3. This proposal will benefit large stores, who can rotate staff, as opposed to small local shops who wish to allow staff Sunday off.
4. We are commanded to keep the Sabbath holy, and this will further diminish the extent to which we do that.
5. This proposal will allow large stores to open at hours which clash with the times of church services thus denying staff the opportunity to attend church.

I would urge the Councils to consider carefully the effect this proposal will have on the health and welfare of your constituents and the effect on the prosperity of small local shop owners.

Hopefully you will reject this proposal.

Yours faithfully

[REDACTED]

8. From: [REDACTED] >

Sent: 03 March 2025 06:49

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Subject: Sunday opening

Dear Sir, the idea that Coleraine and Ballymoney equate to Benidorm or even Bangor is a cynical ploy by big business to squeeze more money into their pockets. (Incidentally Bangor does not have full Sunday opening and the concept of Costa del Ballymoney is laughable, were the consequences not so serious).

Many small businesses struggle to survive in the face of big business concerns and several have already failed.....just look at the number of charity shops that have replaced once viable small businesses. Sunday opening will put additional stress and expense on small business who as I said already struggle.

Yours faithfully,

[REDACTED]

9. From: [REDACTED] >

Sent: 03 March 2025 10:02

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Subject: Sunday Trading Consultation

Dear [REDACTED];

Thank you for the notice re. Coleraine / Ballymoney 'Resort' legislation notice.

In brief, I would be very concerned about the impact of this extension of opening hours, and its reach into major outlets.

Firstly, anyone seeking to get into the employment market, especially at minimum rates of pay, tend to be asked if they are willing to work unsociable hours and also at weekends. By extending the designations to full trading - this is taking valuable rest and leisure time from those who need it most.

Secondly, Sunday is still a Christian day of rest. Many church attending and non-church attending people, (of all ages) as now have more than enough to Manage Monday - Saturday, so making the Sabbath 'just another working day' - impinges significantly on the merit of time out for all our community.

Hope this helps and best wishes

[REDACTED]

Facilitator to;

Killowen Men's/Women's Breakfast groups

Killowen Healthy Walking Club

Killowen Tuesday (Seniors) Group

Killowen 'Fun & Games' Social Hub

Killowen Indoor Bowling Club

Killowen Parish Church, Coleraine

10. TO WHOM IT MAY CONCERN Proposal to Designate Ballymoney and Coleraine a 'Holiday Resort' Further to your proposal to designate Coleraine and Ballymoney we, Retail NI, USDAW, Causeway Chamber Coleraine BID & Ballymoney Chamber wish to outline our objections. It is our belief, based on firm evidence, that should the proposal be passed, the effects would be detrimental to retail staff, their families, independent retailers and the wider community. Retail staff are already under immense pressure to work long hours with the one respite being the legally enforced shorter trading hours on a Sunday. This allows them much needed time with family and friends. In Usdaw's recent survey of retail workers, 94% opposed the proposal, two

thirds are already under pressure to work on Sundays and almost half have caring responsibilities that they are struggling to fit around their work. Not only would the proposed change place extra pressure on retail staff, it would also have a damaging effect on small independent retailers (below 3000 sq. ft.) who can trade for those vital few hours on a Sunday morning. This proposal to allow large multiple supermarkets to open all day Sunday for nearly half the year, will result in several of your local community independent retailers closing. These are retailers providing an invaluable community service for many elderly, disabled and people without cars. Our organisations are pro-business and welcome progressive change that helps both business and the community. We are more than willing to work alongside Causeway Coast and Glens Council and other interested parties to explore options that would deliver a real and meaningful boost to the weekend economy of Ballymoney and Coleraine. We believe the proposal for Holiday status in both towns will not achieve its stated economic aims but will instead worsen the working lives of many retail staff whilst also economically disadvantaging smaller, retail businesses. On behalf of our respective members, we urge you to reject this proposal and accept our offer to work together to find a solution, as we remain committed to a vibrant and successful Ballymoney and Coleraine. Below is a link to a consultation by Belfast City Council in 2017 for reference.

<https://minutes.belfastcity.gov.uk/documents/s65762/Appendix%20%20-%20Sunday%20Trading%20-%20Usdaw%20submission.pdf>

Yours sincerely, [REDACTED]

[REDACTED]

11. From: [REDACTED] >

Sent: 06 March 2025 19:47

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Subject: Sunday extended opening

Dear Sir,

I wish to record my objection to the proposed extension of opening hours for larger stores- using this disingenuous loophole of designation of towns as tourist towns.

When will these large stores be content with their huge profits?

Please refuse this proposal which is not in the best interests of community and people.

Yours faithfully,

[REDACTED]

12. From: [REDACTED] >

Sent: 06 March 2025 19:50

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Subject: Extended hours

I wish to object to the proposed extension of Sunday opening hours.

[REDACTED]

### 13. FAO Licensing Section of the Environmental Services Department, Health and Built Environment

I wish to make representation in relation to the proposal to designate Coleraine and Ballymoney as holiday resorts for the purposes of Sunday Trading.

I note that this is to allow large shops to open for extended hours on up to 18 Sundays per year between 1 March and 30 September.

I wish to express my concerns as a local resident in the Coleraine area in relation to this matter. They are as follows;

- there will be demand and pressure applied to workers (even if rotas) to work for longer periods of time on a Sunday
- it will add to the already significant traffic congestion at the Riverside retail park
- there is significant large shop opening on a Sunday in any case
- the additional traffic congestion could potentially have the effect of impacting on the traffic flow through Coleraine to the various key holiday resorts of Castlerock, Bushmills, Portrush and Portstewart.

I trust that these representations will be taken into consideration at the forthcoming meeting in relation to this consultation.

Kind regards



**14. From:** [REDACTED] >

**Sent:** 07 March 2025 00:48

**To:** environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

**Subject:** The Shops (Sunday Trading) Order 1997

Dear Sir/Madam,

I understand the Council are considering proposals to designate Coleraine as a holiday resort. Having lived in the town for 75 years this is the first time I have heard it described as a holiday resort!

It is obvious that the reason behind this is to enable larger shops such as supermarkets to trade all day on Sundays.

Further commercialisation of the weekend is not necessary - supermarket opening hours already provide more than adequate opportunities for the public to shop. We all deserve the relative peace and quiet that a Sunday brings and I would strongly encourage the council to reject any such change in designation of the town.

Yours sincerely,

[REDACTED]

15. From: [REDACTED] >

Sent: 07 March 2025 14:58

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Subject: Sunday trading hours

Sirs I wish to register my objection to extending Sunday opening hours in Coleraine. [REDACTED]

16. From: [REDACTED] >

Sent: 07 March 2025 15:00

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Subject: Opening hours

Sirs I wish to register my objection to extending opening hours on Sundays in Coleraine. [REDACTED]

From: [REDACTED] >

Sent: 08 March 2025 14:59

To: environmentalhealth <[environmentalhealth@causewaycoastandglens.gov.uk](mailto:environmentalhealth@causewaycoastandglens.gov.uk)>

Cc: [licensing@causewaycoastandglens.gov.uk](mailto:licensing@causewaycoastandglens.gov.uk)

Subject: Sunday Trading Consultation

Hi,

First someone screwed up on the dates, 8th March is today, Saturday.

As an owner of several businesses and premises in Coleraine and Ballymoney, I would be opposed to extended Sunday opening for larger stores.

I do not believe it will increase spend in the borough and will only serve the interests of the owners of the larger multiple stores to the detriment of independents.

I would refer you to the study on the effects of Walmart opening in the US, the effect here is similar

[REDACTED]

[REDACTED]

## TO WHOM IT MAY CONCERN

### Proposal to Designate Ballymoney and Coleraine a 'Holiday Resort'

Further to your proposal to designate Coleraine and Ballymoney we, Retail NI, USDAW, Causeway Chamber Coleraine BID & Ballymoney Chamber wish to outline our objections.

It is our belief, based on firm evidence, that should the proposal be passed, the effects would be detrimental to retail staff, their families, independent retailers and the wider community. Retail staff are already under immense pressure to work long hours with the one respite being the legally enforced shorter trading hours on a Sunday. This allows them much needed time with family and friends.

In Usdaw's recent survey of retail workers, 94% opposed the proposal, two thirds are already under pressure to work on Sundays and almost half have caring responsibilities that they are struggling to fit around their work.

Not only would the proposed change place extra pressure on retail staff, it would also have a damaging effect on small independent retailers (below 3000 sq. ft.) who can trade for those vital few hours on a Sunday morning.

This proposal to allow large multiple supermarkets to open all day Sunday for nearly half the year, will result in several of your local community independent retailers closing. These are retailers providing an invaluable community service for many elderly, disabled and people without cars.

Our organisations are pro-business and welcome progressive change that helps both business and the community. We are more than willing to work alongside Causeway Coast and Glens Council and other interested parties to explore options that would deliver a real and meaningful boost to the weekend economy of Ballymoney and Coleraine.

We believe the proposal for Holiday status in both towns will not achieve its stated economic aims but will instead worsen the working lives of many retail staff whilst also economically disadvantaging smaller, retail businesses.

On behalf of our respective members, we urge you to reject this proposal and accept our offer to work together to find a solution, as we remain committed to a vibrant and successful Ballymoney and Coleraine.

Below is a link to a consultation by Belfast City Council in 2017 for reference.

<https://minutes.belfastcity.gov.uk/documents/s65762/Appendix%20-%20Sunday%20Trading%20-%20Usdaw%20submission.pdf>

Yours sincerely,



CEO  
Retail NI



General Secretary  
USDAW



CEO  
Causeway Chamber



CEO  
Coleraine BID



Chair  
Ballymoney Chamber

Holiday Designation response on behalf of Ballymoney Town Centre Forum and Coleraine Town Team:



Cloonavin  
66 Portstewart Road  
COLERAINE  
BT52 1EY

[Licensing@causewaycoastandglens.gov.uk](mailto:Licensing@causewaycoastandglens.gov.uk)

Date: 5<sup>th</sup> March 2025  
Tel: 028 7034 7018

Dear Sir/Madam,

**Re: Consultation on the designation of Coleraine and Ballymoney as holiday resorts for the purposes of the Shops (Sunday Trading) (Northern Ireland) Order 1997**

I write in response to the Consultation on the designation of Coleraine and Ballymoney as holiday resorts for the purposes of the Shops (Sunday Trading) (Northern Ireland) Order 1997 launched February 2025, through which Council is seeking comment on designating the towns of Coleraine and Ballymoney as holiday resorts, thereby large shops may open for retail trade at **any time** on up to 18 Sundays (other than Easter Sunday) between 1 March and 30 September in any calendar year.

The Council sought the views of the relevant Town Centre Forums in the Borough, Ballymoney and Coleraine which act as an advisory group to the Council under the Town and Village Management Section. Their comments are attached at Appendix 1.

Please do not hesitate to contact me should you wish to discuss further.

Yours sincerely

[Redacted signature]

[Redacted name]

Town and Village Manager

**Appendix 1: Comments from Ballymoney Town Centre Forum and Coleraine Town Team following an online survey of its members. 3 Questions were asked as follows:**

1. Do you agree that Ballymoney should be designated a 'Holiday Resort' for the purposes of extended Sunday Trading between March and September in a calendar year? please answer YES or NO
2. Please give more detail on the why you have responded YES or NO to Qu 1.
3. Details - Name and Organisation on the Town Forum

**Online survey was issued via email to Ballymoney Town Forum members on 11<sup>th</sup> February 2025:**

**9 responses from Ballymoney Town Centre Forum were received by closing date 28<sup>th</sup> February. 78% voted NO 22% voted YES**

Please give more detail on the why you have responded YES or NO to Qu 1.
It's not a holiday resort and is approx. 20km from the North Coast. From a DfI perspective having reduced opening hours on a Sunday helps us with road works.
I do not believe Ballymoney or Coleraine are 'Holiday Resorts'. Is there information gathered that shows an increase of holiday makers to both towns? There are many reasons why shops should not be open earlier on a Sunday, but mainly because staff and shop owners need some down time. Almost all businesses in Ballymoney are small business owners meaning that they themselves are in the shop each day. They and their staff need a day off.
Council should be doing more to protect local independent retailers who would be seriously disadvantaged by this proposal. The current Sunday trading laws are already described by some as a compromise between shop workers, independent retailers and other stakeholders. I do not believe there is the support for this in Ballymoney, I think many of the independent retailers are completely opposed to it as clearly set out by the President of the Ballymoney Chamber It should also be recognised that there are many in our town who have a faith perspective in relation to this matter and strongly hold to persevering what is left of Sunday being a day of rest.
No, Ballymoney is a market town, not a coastal resort. There are also a lot of family run businesses in the town who are opposed to the designation. The shops who wish to open on Sunday can do so, without the need of extending the trading hours.
If there are large local shops in Ballymoney which could benefit from additional trade on the Sundays, yes.
Retailers should have option
Ballymoney is not a tourist town in this sense, it is a local town populated by local people, and there is no need or pressure for additional shopping exposure as this is not desirable for families and employees in the area.
Ballymoney is a rural town and most businesses are independent and this is just big businesses finding a lope hole in the legislation so they can open early on a Sunday.
I speak on behalf of the Ballymoney chamber of commerce and after consulting our membership we are very much against this proposal



**Online survey was issued via email to Coleraine Town Team members on 11<sup>th</sup> February 2025:**

**10 responses from Coleraine Town Team were received by closing date 28<sup>th</sup> February. 50% voted NO 50% voted YES**

Please give more detail on the why you have responded YES or NO to Qu 1.
Sundays tend to be very busy between the current opening hours of 1300-1800. Longer hours could possibly stretch out the traffic and footfall over a longer period of time
When you go to any other country in the world on holidays the shops are open all day every day. We need to move into the 21st century
Although closer than Ballymoney. From a shopping perspective Portrush already has a Lidl. From a DfI perspective the extended closing hours helps us with road works.
Personally I feel that there is already a decent window for trade from 1 - 6pm on Sundays. Family time is important too and for lots of people working in retail, having a Sunday morning and evening off is a relief from some I have talked to about this previously. It's not a terrible idea of course but I'm 60% no.
Coleraine should not be considered as a holiday resort and if Sunday Trading is to be extended this should be considered as a separate issue after consultation with those trading in the town.
Visitors will have more flexibility to shop in both towns and will not be constrained by current Sunday opening times. This should in turn support local business. This all depends on the capacity of local business to be able to staff these extra opening times if approved.
Coleraine is situated in a tourist area and businesses should be open on a Sunday morning for visitors to peruse or shop during tourist season
It is not a holiday destination. Smaller shops do well on Sunday mornings. It would take away from traditional Sunday morning services in the town centre. Employees need a fixed morning off.
If there are large local shops in Coleraine which could benefit from additional trade on the Sundays
The response on behalf of Causeway Chamber is 'Causeway Chamber concurs with comment submitted by Coleraine BID' which highlights the need to review legislation relating to Sunday opening hours.