European Retail Real Estate: Successfully Navigating a World in Transition

Industry Responding Fast to Technological and Behavioural Change

Abstract: This article highlights the major trends that are currently impacting the retail real estate industry in Europe relating to demographics and consumer attitudes/behaviour, real estate/property performance, investor sentiment and retailer strategy. It is based on insights from ICSC’s European Research Group.

The European retail landscape is undergoing structural change, driven by macro demographic trends, technological advancements and ever-evolving consumer preferences and behaviour. The combination of these trends and expectations is having a huge impact on the retail real estate sector, in terms of consumer spending patterns, new business models, retailer strategies and space allocation.

Overall, European economic fundamentals remain solid. Unemployment rates are declining in most countries and Gross Domestic Product is expected to grow for the seventh year in a row in 2019 with expansion forecast in every European Union (EU) member state, albeit the pace has moderated compared with the high rates of recent years. According to CBRE forecasts, Spain, Ireland, Sweden and Central European will continue to see the fastest rates of economic growth over the next five years.

However, the European Commission warns that external factors could have global repercussions, such as an abrupt fiscal tightening in the U.S. and a sharper-than-anticipated slowdown in the Chinese economy. Closer to home, the continued uncertainty over the UK’s departure from the EU is likely to shape consumer sentiment and spending in the short term, with slow and below-trend growth forecast for the UK to 2020 (but with better longer-term potential) and concerns about rising costs and friction in the supply chain following that exit.

Key Takeaways

- **Smartphones are driving digital commerce growth in Europe**, although the highly anticipated launch of 5G technology, which will enable Internet of Things (IoT) connected devices and augmented/virtual reality, is still some way off.
- Europe’s population is ageing, and a *new kind of affluent, time-rich mature consumer is emerging* with a strong focus on health and well-being.
- The notion of ‘conscious consumption’ crossed over into mainstream public awareness in 2018 and is increasingly having an impacting on purchasing decisions.
- Consumers are prioritising *access over ownership*, prompting emerging alternative business models founded on the sharing economy.
- Retail landlords are diversifying their income streams into other real estate sectors by creating *additional value from land surrounding their developments*.
- **Leisure and entertainment occupiers are becoming the new anchor tenants** as shopping centre owners reposition their assets into consumer centres.
- Retailers and landlords are increasingly looking to *mergers and acquisitions and partnerships/alliances* in order to achieve growth and benefit from economies of scale.
- European retail markets are seeing a *polarisation of performance*, with destination and convenience locations and luxury and discount sectors outperforming mid-market offerings.
- Occupier distress is impacting on industry perception, although *sentiment should start to pick up in 2019 due to positive underlying fundamentals* in Europe, but investors will remain selective regarding retail assets.
- The most successful retailers are restructuring their businesses and investing heavily in reconfiguring their supply chains and inventory management systems to *optimise their omni-channel strategies*.

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Despite these risks and the ongoing negative scrutiny of the retail sector, European retail markets remain strong:

- **Total retail sales rose by 1% from 2017 to 2018** to reach almost €3.3 trillion and annual growth is forecast to increase to 2% this year. (See Chart 1.)
- **Store-based retailing continues to be the dominant sales channel**, accounting for 90% of total retail sales in Europe in 2018, with online sales at only 9% of total retail sales (highest in the UK at 17%).
- **The pace of online sales growth is, however, slowing considerably in the mature retail markets** and will continue to do so, particularly because of a predicted rise in legislative support to level the taxation playing field.

### A. Demographics and Consumer Attitudes/Behaviour

### I. Europe’s digital landscape: the mobile commerce explosion

The traditional path to purchase has become ever more complex with consumers being the driving force, demanding to shop anywhere and at any time. Technology, as an enabler of digital commerce, is one of the key reasons why power has shifted to consumers.

Retail digital commerce in Europe has grown by 86% over the past five years to reach €367 billion in 2018 and is forecast to expand by 66% from 2018 to 2023 at an average annual rate of 10.7%. (See Chart 2.) It is worth noting, however, that despite the impressive growth rates, internet retailing accounted for only 7.9% of total European retail sales in 2017 and only 4.5% of total turnover was from pure-play retailers, meaning 94% of total European retail sales were attributed to omni-channel retailers.³

The primary driver of retail digital commerce is mobile commerce on smartphones, rising by 1,141% between 2013 and 2018, and forecast to grow by 185% in the five years to 2023. **Smartphones accounted for only 3.6% of digital commerce in 2013, rose to 23.8% in 2018 and is expected to grow to 40.8% in 2023**, according to market intelligence firm Euromonitor International.

There are, however, significant differences among European countries, and the influence of the mobile channel over other digital

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³ Euromonitor International; 2017 pure-play Internet sales data are the latest available.
channels is more defined in the UK and Southern Europe. The first European country to reach the mobile tipping point—where more online sales take place via a smartphone or tablet than via a PC—was the UK in 2016, followed by Italy a year later. The next countries to reach this milestone are forecast to be Spain in 2021 and Sweden in 2022, according to Euromonitor International.

Despite the growing prevalence of digital commerce, marketing, technology and data specialist CACI estimates that 5% of all online purchases in the UK are returned (compared with only 1% of purchases made in-store), rising to 8% of purchases via a tablet and 12% for mobile phone transactions. Of these returns, 39% are taken back to the store, highlighting the essential role that brick-and-mortar plays in the pre- and post-purchase customer journey.

German shopping centre owner/developer ECE has developed an award-winning ‘Digital Mall’ online product search at its Alstertal-Einkaufszentrum property in Hamburg, which was extended to four additional pilot centres. Customers can use it to get information about available products from the website of their local centres. In addition, they can reserve a product and pick it up on site. Thus, when searching for a product online, they will not be automatically directed to major e-commerce websites.

Linked to the growth of digital commerce is the huge anticipation regarding the launch of 5G technology, which will deliver mobile streaming up to 20 times faster than 4G and will better enable technology like the predicted explosion of connected devices known as the IoT, as well as aiding the use of augmented and virtual reality. The European Commission launched its 5G action plan in September 2016 to keep Europe ‘ahead’ in the race for the new technology; however, despite the expectation, the 5G outlook for the continent is still a question mark. With 2021–2022 often cited as a launch date for widespread commercial coverage, it is anticipated that Europe will lag other global players such as the United States, China, South Korea and Japan.

II. Unlocking the value of the silver generation

According to Coresight Research, more than one-quarter of the total population in Western Europe and Southern Europe will be aged 65 or older by 2030, while in Northern Europe, the share will be more than one-fifth, driven by a greater focus on health and well-being and longer life expectancy. This demographic trend represents a significant opportunity to serve a growing and affluent consumer group who are rich in leisure time. Indeed, Coresight’s research in the UK has found that senior households tend to spend more on a per-person basis than the average household and devote a greater proportion of their total spending to retail and leisure categories.

Both retailers and landlords are waking up to the potential spending power of the ‘silver generation.’ Euromonitor describes this group as ‘age-agnostic’—people who want to remain active and social for as long as possible by prioritising health preservation. Baby Boomers are redefining ageing by being just as preoccupied with technology as their younger cohorts.

In recent years, the retail industry has focused on millennials and Gen Z, but as ever-increasing costs, student debt and rising house prices prevent the younger generations from getting on the housing ladder, a shift in attitudes is now emerging—perhaps expressed most vividly in L’Oréal Paris’s 2018 ‘Age Perfect’ advertising campaign that challenged the perception of ageing.

This new health-conscious mature consumer is spurring sales of complementary and alternative medicine products and services, as well as vitamins and supplements, organic products, cosmetics and beauty products, and wearable fitness devices.

III. Changing values: the rise of the ethical consumer

The year 2018 saw the rise of ‘conscious consumption,’ whereby consumers consider the social, environmental, ecological, and political impact of products or services they buy and/or consume. What was once seen as a niche market has gained momentum over the last 12 months or so and has now crossed over into mainstream public consciousness. This growing awareness about sustainability is increasingly influencing purchasing decisions. According to research by UK-based retail business news and intelligence provider Retail Week, 72% of UK consumers aged 18–24 would be willing to pay more for an environmentally friendly product, as would 64% of those aged 25–34. This falls to 47% for consumers over the age of 35.

Consumers are not only concerned about the ecological credentials of the products themselves but also where they come from and how they are made. A Business of Fashion/McKinsey & Company report reveals that ‘nine in ten Generation Z consumers believe companies have a responsibility to address environmental and social issues. The inclusion of the latter is a departure from the views of the previous generation of millennials, which had a greener focus.’ However, the report goes on to say that concern over environmental and social issues is not restricted to younger consumers, as two-thirds of consumers worldwide say they would switch, avoid or boycott brands based on their stance on controversial issues.

As a result, consumers are putting pressure on the retail industry to improve standards, which is supporting greater transparency in the supply chain and manufacturing process. Retailers are now experimenting with the use of blockchain to track items back to their source, such as London-designer Martine Jarlgaard, who in 2017 collaborated with blockchain expert Provenance to create a fully tracked garment that when scanned in-store provided information on the history of the product, ensuring all raw materials were from sustainable sources. In addition, Auchan Retail is using blockchain technology to improve the traceability of the products along its supply chains. The initial testing in Vietnam, alongside Te-Food, a German start-up, has proved to be a success and it is now being rolled out to France, Italy, Spain, Portugal and Senegal.

Consumers are also more intensely scrutinising a brand’s character. They want to see firm evidence of how it is implementing sustainability initiatives, and European companies are responding accordingly. Last year, Swedish furniture retailer...
IKEA announced that it is phasing out oil-based plastics and is committed to making all products from recycled materials by August 2020 and discontinuing single-use plastic products, such as straws, plates and cups, from stores and restaurants by 2020. The company has also invested in a plastics recycling plant in the Netherlands and has bought wind farms in Poland and forests in the Baltics and Romania.

Other European companies are pursuing their own initiatives:

- Also headquartered in Sweden, fashion retailer H&M plans to use only recycled or sustainably sourced materials. This is part of its effort to become a ‘circular organization’ by 2030, promoting resource efficiency by replacing a linear ‘take, make, dispose’ model of production with one where materials function at their highest utility at all times.
- U.K.-based grocery retailer Iceland intends to remove all plastic packaging from their private label-products by 2023, with the aim that all paper-based and other packaging for the private label still be fully recyclable through domestic waste collection facilities or in-store facilities.
- UK-based Tesco will impose a ban on all non-recyclable plastic by year-end 2019.

IV. Access over ownership

Closely linked to the trend of ‘conscious consumption’ is the rise of alternative business models founded on the principles of the sharing and circular economies: notions that increasingly consumers want access rather than ownership, or extended product lifecycles. Business of Fashion/McKinsey & Company highlights three developments to expect in 2019, ‘First, the number of brands getting into the rental, resale and refurbishment business will increase markedly; established players will progressively regard alternative ownership as a force they need to embrace or at least test through new collaboration models with retailers or start-ups in the sector. Second, we predict a notable increase in the number of “rental native” brands born exclusively for rental or subscription models. Finally, more consumers will see a growing proportion of their wardrobes made up of pre-owned or rented products, especially for high-value items and accessories.’

Both retailers and shopping centre owners are adapting their business models to this trend. In championing a circular economy marked by aims to extract maximum value from resources while in use, and then recover and reuse products and materials at the end of each service life, IKEA is trialling a furniture rental scheme in Switzerland. On the landlord side, in its ‘Destination 2028’ vision launched in June 2018, Westfield included rental-retail space to reflect the rise of the sharing economy.

B. Real Estate/Property Considerations

I. Intensification: Blurring of lines between sectors

In recent years, European development has slowed with the number of net new additions to space on a downward trajectory due to less ambitious retailer expansion plans and a lack of available credit. Most shopping centre markets are arguably at or near maturity and, as such, development will increasingly focus on the revitalisation and renewal of existing space.

In some cases, this will mean right-sizing and repositioning of assets but for others, struggling secondary schemes in particular, it could involve complete demolition to make way for redevelopment focused on mixed-use, including offices, residential, hotels, leisure and urban logistics.

Landlords are investing in and adapting their schemes to meet the demands of today’s consumers and to diversify their income streams. In October 2018, UK shopping centre owner Intu announced that it would enter the private rented sector. It identified the potential for approximately 5,000 residential units on land around six of its out-of-town centres, as well as almost 600 hotel rooms. In addition to the residential and hotel opportunities, further mixed-use opportunities relating to offices, flexible working spaces, business lounges and service-oriented uses have been pinpointed by Intu that could generate attractive incremental returns to the current rental income stream.

Also in the UK, Hammerson—which holds 65 acres of land around prime city locations—plans to create more mixed-use lifestyle venues through its new ‘City Quarters’ concept.

II. The new anchor: leisure and entertainment

Although retail overwhelmingly remains the primary driver behind shopping centres, non-retail tenants, particularly those focused on entertainment and leisure, represent a fast-growing trend. Consumers’ identities and social capital are now focused around what they do, experience and share on social media, rather than what they own. Indeed, a 2017 survey by Euromonitor reveals that, on average, over a third of European consumers prefer to spend their money on experiences rather than things, reaching as high as 42% of consumers in Italy and Turkey.

Landlords are diversifying the tenant mix as they transform properties into consumer centres. Including or expanding leisure facilities can effectively repurpose vacant space and incorporate diversity and vitality into shopping centres. An integrated and evolving entertainment offer can help meet consumers’ expectation for experience. Long the domain of department stores and hypermarkets, leisure and entertainment occupiers are becoming the new anchor tenants in recognition of their impact on centre footfall, dwell time, sales and overall scheme attraction.

This trend towards leisure and entertainment is reflected in Intu’s Costa del Sol shopping resort development in Torremolinos, Spain, on which work is expected to start in 2019. In addition to retail, the 175,000-sq m site will include open-air skiing, a theme park, an aquarium, a year-round circus and a concert venue.

Food and beverage (F&B) is an important bridge between retail and other entertainment uses, particularly as CACI estimates that a shopper who uses a centre’s catering facilities spends 51% more on retail than one who does not. As a result, ‘the amount of space typically dedicated to F&B within existing shopping centres has grown exponentially from 5% a decade ago, to 10–15% now in

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9 Ibid.
10 Elias Jahshan, ‘Ikea to Trial Furniture Rental Scheme,’ Retail Gazette, 4 February 2019.
12 Cushman & Wakefield, ‘Europe’s Shopping Centre Market is Reaching Maturity,’ 30 October 2018.
14 CACI, ‘Retail Landscape 2018,’ October 2018.
some European markets, but is forecast to reach 20% of total space in some of these markets by 2025.\(^{15}\)

Competition in this sector is intense, with F&B accounting for 20% of all leases in Europe in the first half of 2018\(^ {16}\)—leading to concerns about saturation in the more established branded restaurant markets, such as the UK. Consumers are more brand-agnostic when it comes to eating out, so maintaining a high level of repeat visits is an ongoing challenge for F&B operators.

**C. Investment and Performance Trends**

**I. The quest for economies of scale: mergers and acquisitions**

In a challenging trading environment with pressure on organic sales growth, an increasing number of retail companies are entering into mergers and acquisitions (M&A) or partnership agreements in order to generate growth and benefit from economies of scale.

In the UK, figures compiled by law firm RPC show that in the year to 31 March 2018, there were 37 retail mergers and acquisitions—up by 15% from 32 in 2016–2017.\(^ {17}\) The biggest increase in deals was in the fashion/clothing retail sector with the number of M&A deals more than doubling from five to 12, although many of these were relatively small when compared with the higher-value M&A deals taking place in the food retail sector.

Although now looking unlikely as a result of the Competition and Markets Authority’s scathing provisional findings of ‘extensive competition concerns’ (albeit the final report is not due until April), the proposed £13 billion mega-merger of Sainsbury’s and Asda, Britain’s second-and third-largest supermarket chains, highlights the deepening appeal of retailers joining forces to build scale and expand breadth of offer. This is a familiar tactic for Sainsbury’s, having previously purchased Home Retail Group, the owner of Argos and Habitat, for £1.4 billion in 2016.

But the proposed Sainsbury’s-Asda deal is only one of many high-profile tie-ups:

- **Tesco bought Britain’s largest food wholesaler, Booker,** in a £4 billion deal in March 2018 and formed a ‘strategic alliance’ with Carrefour that will allow them to improve choice, quality and, crucially, source goods at lower prices.

- **Carrefour** has also announced a partnership with **Google** in France on a new grocery shopping experience, which will be available in 2019 through the Google Assistant, connected speakers like Google Home and a new experience on the Google shopping website.

- **Marks and Spencer (M&S)** confirmed in February 2019 a £1 billion joint venture with online grocer Ocado that would give M&S a full online food delivery service for the first time.

- The merger of the two leading department stores **Galeria Kaufhof (Hudson’s Bay Company)** and **Karstadt (Signa Holding GmbH)** was completed in November 2018, creating one of the largest European omni-channel providers with 243 inner-city locations and a strong e-commerce platform.

More specialist consumer goods and retail businesses are acquiring e-commerce specialists to enhance their online distribution channels, including the acquisition of Italian online fashion retailer, YOOX Net-A-Porter, by Swiss luxury brand owner, Compagnie Financière Richemont, for €2.6 billion, and Richemont and Alibaba Group’s announced global strategic partnership in October 2018 to bring the retail offerings for YOOX Net-A-Porter Group to Chinese consumers.

Retail real estate owners are also looking to M&A to deliver valuable synergies, as exemplified by Unibail-Rodamco’s acquisition of Westfield for $32 billion in 2018 and the failed Hammerson/Intu and Intu/Klepierre tie-ups.

**II. Polarisation of performance: experiential and convenience retail continue to thrive**

European retail markets are seeing a clear polarisation of performance with retail formats that cater to either experience or convenience proving to be the most resilient parts of the sector. Larger city centres and dominant regional shopping centres continue to see strong demand from both consumers and retailers; however, there has been an adverse impact on tertiary and secondary parts of the market, notably secondary high streets and centres, due to strong competition from more accessible shopping locations with a broader and better offer.\(^ {18}\)

In addition, convenience retail remains relevant due to consumers’ need for local ‘top-up’ purchases. As a result, some retailers are launching store concepts that focus on convenience, such as Auchan’s scan-and-go ‘Minute’ kiosks arriving in France in March 2019 or rapidly expanding German discount supermarket chain Aldi’s small-format city centre convenience stores. The locations at greatest risk are those which lack critical mass, a defined offer or a strong experiential or convenience element.

There is also polarisation between the luxury and discount sectors with middle-market brands being squeezed. This is particularly evident in the department store sector where, according to AXA Investment Managers, ‘mid-range department stores with indistinct positioning, delayed online presence and a lack of innovation have struggled to compete with fast fashion, discounters and online players in the affordable segment and high-end stores at the other end of the spectrum.’\(^ {19}\)

In recent years, Europe has seen the demise of BHS in the UK and V&D in the Netherlands, as well as store closures for Debenhams, House of Fraser and M&S in the UK, whilst high-end department stores, such as Selfridges and Galeries Lafayette, continue to reap the rewards of ongoing innovation and investment.

As an experience that combines both a value proposition and a luxury retail offer, European outlets continue to perform strongly. These centres are destination-led and have benefitted from a sharp increase in international tourism, driven by the growth of the middle class, particularly in emerging Asian economies.

\(^{15}\) ICSC/JLL, ‘The Successful Integration of Food & Beverage Within Retail Real Estate,’ 2017.

\(^{16}\) CBRE, ‘EMEA Real Estate Market Outlook 2019,’ November 2018.

\(^{17}\) Caitlin Morrison, ‘Retail Mergers and Acquisitions Rise by 15% as Businesses Try to Combat Falling Sales,’ The Independent, 7 May 2018.

\(^{18}\) Cushman & Wakefield, ‘European Retail: The Revolution Continues—A Summary of the Key Trends, Challenges and Opportunities by Sector,’ Winter 2018/19.

\(^{19}\) AXA Investment Managers, ‘Retail is not Dead and Regionally Dominant Shopping Centres Offer an Attractive Value Play,’ January 2019.
III. Negative investor sentiment driven by occupier distress

Although the majority of consumer fundamentals appear to be fairly robust and the level of retail investment in continental Europe remains well above the 10-year average, over the past year retail insolvencies and store rationalisations have had a negative impact on investor perception of the retail real estate sector in Europe. (See Figure 1.)

On the positive side, European retail markets saw several retailers entering new territories in 2018, with more planned for 2019. (See Table 1.) Furthermore, value retailers, such as Aldi, Lidl, Biedronka and B&M Bargains, continue to expand at a fast pace and there is increased demand from non-retail tenants, particularly international companies in the health and fitness sector, such as U.S. indoor cycling studio and showroom Peloton and Australian fitness chain F45, as well as F&B operators including Five Guys, Vapiano, Nandos, Wagamama, Joe & The Juice, Pret A Manger and Starbucks. European markets are also seeing the continued growth of food halls/markets, as exemplified by the recent openings of Eataly in Paris, Stockholm and Milan. Despite these retailer expansions, store openings are unlikely to offset total closures.

![Figure 1](link)

**Key Store Rationalisations and Retailer Administrations in 2018/2019**

![Retailer Administrations](link)

**Table 1**

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<thead>
<tr>
<th>Company</th>
<th>Country of Origin</th>
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<td>Falconeri</td>
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<td>Five Guys</td>
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<td>Yves Salomon</td>
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Source: ICSC Research
There are, however, signs from the U.S. market that sentiment will start to turn during 2019. As highlighted by JLL, the U.S. saw a similar de-rating of the retail property sector as a result of retailer failures and strong growth in online sales, which climaxed in the final quarter of 2017. Since then, however, underlying retailer trading data has improved and retail property stocks have rebounded. With a more mature online market, less retail stock per capita and a smaller proportion of space taken by department stores, JLL argues that the fundamentals in Europe are more positive, although investors will remain selective regarding retail assets. The property agent believes there will remain a robust, but smaller, universe of investible retail product that will benefit from strong demand and generate resilient and stable returns for investors (generally well-located assets with strong underlying land-use values).

D. Retailer Strategy

I. Investing in an omni-channel distribution model

The growth of e-commerce has undeniably changed the role of the store, but it has not diminished the relevance and value of maintaining a physical presence, as evidenced by the number of pure-play retailers opening brick-and-mortar locations, including Zalando in Germany and Coolblue in Belgium and the Netherlands.

The existence of physical stores builds trust and confidence in a brand and provides a crucial opportunity for consumers to access before- and after-sale support, as well as fostering click-and-collect. Indeed, an ICSC survey of over 7,000 European consumers conducted in January 2019 found that over half of online shoppers say it is important for retailers to have a physical store presence as well, rising to 63% for the millennial generation.

Clearly, today’s channel-agnostic consumers move back and forth between bricks and clicks throughout the shopping journey and expect the same experience across all channels. Retailers are increasingly using technology and big data to better understand customers’ path to purchase.

In order to cater to this omni-channel model, retailers recognise that the physical and digital cannot function in silos and are restructuring their businesses accordingly, as well as investing heavily in reconfiguring their supply chains, inventory management systems and staff training initiatives.

In 2018, M&S unveiled its new ‘technology transformation programme’ as part of its aim to become a digital-first driven business. Changes include the creation of a Technology Operating Model, which is set to drive significant efficiencies in how M&S works, the appointment of Tata Consultancy Services as its main tech partner and the simplification and consolidation of M&S’s technology supplier base. The retailer has also partnered with Decoded to create the M&S Data Academy, which will allow employees from every department to learn new skills that promote digital transformation across the organisation.

To optimise their omni-channel strategy, many retailers are focusing on fewer but larger flagship stores, which are generally located in prime high-street or shopping centre locations in gateway European cities, such as Adidas’ 2,260-sq m concept store on the Champs Elysées in Paris. These locations serve as customer experience and engagement nodes and fulfil click-and-collect and returns services. Due to affordability concerns, retailers are also increasingly considering second-tier cities, particularly those with a strong tourism offer.

E. Conclusion

Advances in technology and changing consumer shopping behaviour are driving a mobile commerce explosion in Europe. But physical stores remain an integral part of a retailer’s ecosystem and brands are investing heavily in omni-channel distribution strategies.

Market sentiment has been on the downside over the past 12 months as a result of occupier distress and, as a result, landlords are diversifying their tenant mix and income streams to reposition schemes as consumer centres or mixed-use properties. However, destination- and convenience-led retail continue to perform strongly, as do the luxury and discount sectors, particularly outlet centres combining both high-end and value aspirations.

A perceptible shift in consumers’ ethical values is supporting emerging business models based on the circular and sharing economies—a particular concern of the younger generations. That is not to say, however, that mature consumers’ voices are not being heard as the industry is placing a growing emphasis on meeting the needs of the wealthy and time-rich ageing population, which is spurring growth in the health & beauty, and fitness and leisure sectors.

ICSC Research would like to thank its European Research Group for sharing the insights that inform this article.

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22 One obstacle: The EU General Data Protection Regulation (GDPR), implemented in May 2018, which has made profiling and targeting of consumers more challenging, with a greater emphasis on user consent and data protection.