



Tunbridge Wells Borough Council

# Greenhouse Gas Emissions Report 2024-2025

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Accessible Version  
February 2026



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# Glossary

**Carbon Dioxide Equivalent:** A unit of measurement to express multiple greenhouse gasses under one unit. These greenhouse gasses are based upon their global warming potential (GWP) and expressed as the amount for carbon dioxide that would result in equivalent global warming.

**Carbon Footprint:** This is the total greenhouse gas emissions released by an organisation, expressed in carbon dioxide equivalent.

**Carbon Offsetting:** The process by which carbon dioxide equivalent is removed or reduced in the atmosphere as compensation for equivalent emissions released elsewhere.

**CH<sub>4</sub>:** Methane.

**CO<sub>2</sub>:** Carbon Dioxide.

**CO<sub>2e</sub>:** Carbon Dioxide Equivalent.

**Emissions Factor:** A unit of conversion, used to convert the impact of an activity into its equivalent production or use of greenhouse gas emissions.

**Emissions Reduction:** Direct reduction or avoidance of greenhouse gas emissions.

**GHG:** Greenhouse Gases.

**N<sub>2</sub>O:** Nitrous Oxide.

**NF<sub>3</sub>:** Nitrogen Trifluoride.

**Scope 1:** Direct greenhouse gas emissions from sources a company owns or controls, such as from its own fleet of vehicles or on-site fuel combustion for its operations.

**Scope 2:** Indirect emissions from the generation of purchased electricity, steam, heat, or cooling that a company consumes.

**Scope 3:** Other indirect emissions that occur in a company's value chain, both upstream and downstream, including transmission and distribution, water consumption and treatment, well to tank, staff commuting, staff working from home, purchased goods and services, business travel and end-of-life treatment of products.

**SF<sub>6</sub>:** Sulphur Hexafluoride.

# 1. Introduction

Anthropogenic climate change, driven by fossil fuel combustion and deforestation, presents a critical global challenge. There has been increased urgency to tackle climate change at all levels of society. 2024 was the fourth warmest year on record in the UK (dating back to 1884), with the last three years in the UK's top five warmest on record<sup>1</sup>. Globally, 2024 was the hottest year on record and the first calendar year to breach a global mean temperature of more than 1.5°C above pre-industrial averages<sup>2</sup>.

These trends underscore the accelerating pace of climate impacts, including more frequent extreme weather events and biodiversity loss. Without decisive action, the consequences for ecosystems, economies, and human health will become increasingly severe and irreversible.

Following the full council, ([FC29/19](#)), declaration of a “climate and biodiversity emergency” and the establishment of the Council's initial 2030 net zero ambition, a Corporate Carbon Descent Plan (CCDP) was developed alongside the Climate Emergency Advisory Panel (CEAP). The CCDP was adopted in March 2021 ([CAB115/20](#)), forming a key strategic policy document. The council's commitment to climate action and net zero was further re-affirmed through the newly adopted [Strategic Plan](#) in 2025. This strategic plan sets out climate action and achieving net zero as an organisation and borough as a priority for the current administration.

In October 2025 cabinet ([CAB83/25](#)) agreed to review the council's net zero approach and proceed with aligning with the BSI Net Zero Pathway. This was agreed to provide greater transparency regarding the council's emissions and set a clear pathway to net zero that was achievable and verifiable.

This emissions report acts as a reset for our approach to net zero and will be the starting point for a review of our net zero target. Focus will be one setting out a standard aligned approach, prioritising what is achievable for a local authority, with significant budgetary pressures, looming local government reorganisation, and a changing political landscape.

This approach aims to provide clarity on the council's current emissions profile and identify key areas where reductions can be made most effectively. By adopting a transparent and evidence-based methodology, the report seeks to build confidence among stakeholders and ensure that future actions are both practical and measurable.

This report sets out TWBC's approach to calculating its corporate emissions and details a full GHG emissions inventory. This report has been prepared in accordance with the principles and requirements of ISO 14064-1:2018. The GHG emission data has been compiled using established methodologies and reliable source information to ensure accuracy and completeness. Verification of this report and its GHG data has been conducted by the British Standards Institution, to reasonable assurance of 5% materiality.

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<sup>1</sup> Royal Meteorological Society (RmetS). (2025) Annual climate stocktake shows weather records and extremes now the norm in UK Climate. Available at: [Annual climate stocktake shows weather records and extremes now the norm in UK Climate | Royal Meteorological Society](#) (Accessed: 24 November 2025).

<sup>2</sup> Hausfather, Z. (2025) State of the climate: 2024 sets a new record as the first year above 1.5C. Available at: [State of the climate: 2024 sets a new record as the first year above 1.5C - Carbon Brief](#) (Accessed: 24 November 2025).

# 2. Reporting Overview

## 2.1. Organisational Overview

### 2.1.1. Description of Organisation

Tunbridge Wells Borough Council (TWBC) is a local authority located in the South-East of England. As part of a two-tier authority structure, TWBC is responsible for a smaller geographic area, when compared to the County Council. Responsibilities include (but are not limited to): waste collection, planning applications, council tax collections, leisure provision, grounds maintenance, environmental health, public infrastructure, and private sector housing.

### 2.1.2. Responsibilities

Persons responsible for this management and preparation of this report and emissions inventory:

- Henry Saunders, Sustainability Manager – Tunbridge Wells Borough Council

Assisting with data collection and supporting information:

- Jess Berry, Graduate Climate Change Officer – Tunbridge Wells Borough Council

### 2.1.3. Audience and Dissemination

This GHG Report has been developed for TWBCs management team and cabinet to support strategic decision making, to achieve organisational net zero ambitions.

This report also provides transparency for wider internal and external stakeholders, such as employees, councillors, residents, and partners. Furthermore, enhanced transparency on TWBCs emissions helps communicate the council's commitment to reducing them.

In addition, the report is intended for use to achieve verification and assurance against ISO 14064-1:2018 and other relevant ISO standards.

The report is published annually on the Council's dedicated website ['TWBC Climate Action'](#), where it is publicly available in full.

## 2.2. Reporting Period and Frequency

The reporting period for this GHG emissions report is 01/04/2024 – 31/03/2025.

Emissions reports will be conducted annually, to consistently monitor TWBC's emissions over time and achievement of Net Zero objectives.

## 2.3. Base Year

The base year for TWBC's GHG emissions report is this 2024/25 financial year.

TWBC have conducted previous emissions report back to 2018/19. However, the base year has been moved to the first year in which we have complete and verifiable data (2024/25), to achieve ISO 14064-1 and ensure accurate and reliable emissions management going forwards.

## 2.4. Base Year Recalculation Policy

To ensure representativeness of the 2024/25 base year, TWBC will apply a review and recalculation to account for any substantial cumulative changes arising from the following:

- Structural change in the reporting or organisation boundary (e.g. merger, acquisition, or divestiture).
- A change in the calculation methodology or emissions factors.
- The discovery of a substantive error or cumulative errors that are collectively substantial.

Where emissions increase due to such changes, recalculation will occur if these emissions meet or exceed 10% of TWBC's base year emissions.

If a lack of data is a limiting factor when recalculating the 2024/25 base year, then the next most appropriate year will be recalculated.

# 3. Methodology

## 3.1. GHG Inventory Boundaries

### 3.1.1. Organisational Boundaries

The reporting boundaries for this report were set using the operational control approach. Under this approach, the organisation accounts for 100% of the GHG emissions from operations and the value chain over which it has operational control. Operational control applies when the organisation has the full authority to introduce and implement its operating policies at the operation.

The approach taken for the Base Year Carbon Report has followed the operational control methodology and captures the operations and activities at all TWBC owned and operated sites.

This boundary is therefore inclusive of all owned and leased buildings (upstream and downstream), organisational waste, vehicles, staff transport, homeworking and organisational purchases and contracts (including tier 1).

This report contains the footprint of the entire organisation: Tunbridge Wells Borough Council.

There has been no change in this current (base) reporting year, with regards to the organisational boundaries, compared to previous emissions reporting conducted.

### 3.1.2. Reporting Boundaries

Details on the description of the activity categories and scopes included within this emissions report can be found below. Emissions sources are broken down into the Greenhouse Gas Protocol (GHGP) Scopes:

- Scope 1: Direct emissions.
- Scope 2: Indirect emissions from electricity.
- Scope 3: Indirect emissions.

Scopes are further subdivided into the following ISO14064-1 categories.

- Category 1: Direct GHG emissions and removals.
- Category 2: Indirect GHG emissions from imported energy.
- Category 3: Indirect GHG emissions from transportation.
- Category 4: Indirect GHG emissions from products used by organisation.
- Category 5: Indirect GHG emissions associated with the use of products from the organisation.
- Category 6: Indirect GHG emissions from other sources.

There have been some changes in this current (base) reporting year, with regards to the reporting boundaries, compared to previous emissions reporting conducted. Additional

emissions sources have been included in the emissions report, which have not been calculated previously:

- Homeworking
- Downstream Leased Assets
- Upstream Leased Assets
- Waste Production.
- Supply Chain: Goods and Services
- Supply Chain: Purchasing Card

### Scope 1: Direct GHG Emissions

ISO Category	Emissions Source	a) Description and Rationale b) Calculation Methodology c) Data Source d) Uncertainty Risk
Category 1	Stationary Combustion Fuels	a) Emissions from combustion of stationary fuels directly related to TWBC's operations (gas biomass, biofuel, propane, petrol). b) Activity data is multiplied by DESNZ emissions factors. c) Invoices, fuel receipts and EPC data. d) Low – Medium.
Category 1	Vehicle Fleet	a) Emissions from the mobile combustion of fuels directly related to TWBC's owned vehicle fleet. b) Activity data is multiplied by DESNZ emissions factors. c) Invoices and fuel receipts. d) Low.

### Scope 2: Indirect GHG Emissions from Imported Energy

ISO Category	Emissions Source	a) Description and Rationale b) Calculation Methodology c) Data Source d) Uncertainty Risk
Category 2	Electricity	a) Emissions from the generation of electricity purchased by TWBC across its facilities and vehicles. b) Activity data is multiplied by DESNZ emissions factors. c) Invoices, energy bills and EPC data. d) Low – Medium.

### Scope 3: Indirect GHG Emissions

ISO Category	Emissions Source	a) Description and Rationale b) Calculation Methodology c) Data Source d) Uncertainty Risk
Category 2	Electricity Transmission & Distribution Losses	a) Emissions from the transmission and distribution of purchased energy by TWBC. b) Activity data is multiplied by DESNZ emissions factors. c) Invoices, energy bills and EPC data. d) Medium.
Category 4	Water Supply	a) Emissions from TWBC consumption of mains supplied water. b) Activity data is multiplied by DESNZ emissions factors.

ISO Category	Emissions Source	a) Description and Rationale b) Calculation Methodology c) Data Source d) Uncertainty Risk
		c) Invoices and water bills. d) Low.
Category 4	Water Treatment	a) Emissions from TWBC mains water treatment. b) Activity data is multiplied by DESNZ emissions factors. c) Invoices and water bills. d) Low.
Category 4	Waste Production	a) Emissions from the disposal of waste generated by TWBC. b) Activity data is multiplied by DESNZ emissions factors. c) Monthly contractor reports and waste transfer notices. d) Low.
Category 3	Business Travel	a) Emissions from the transportation of employees for business related purposes, by transport means not owned or operated by TWBC. b) Activity data is multiplied by DESNZ emissions factor, and the DEFRA SIC Code emissions factors. c) Employee mileage and public transport claims and the staff survey. d) Medium.
Category 3	Business Travel Transmission & Distribution Losses	a) Emissions from the transmission and distribution of purchased energy from the transportation of employees for business related purposes, by transport means not owned or operated by TWBC. b) Activity data is multiplied by DESNZ emissions factor. c) Employee mileage and public transport claims. d) Medium.
Category 3	Staff Commuting	a) Emissions from the commute of employees by transport means not owned or operated by TWBC. b) Activity data is multiplied by DESNZ emissions factor. c) Staff survey. d) High.
Category 3	Staff Commuting Transmission & Distribution Losses	a) Emissions from the transmission and distribution of purchased energy from the commute of employees by transport means not owned or operated by TWBC. b) Activity data is multiplied by DESNZ emissions factor. c) Staff survey. d) Medium.
Category 5	Downstream Leased Assets	a) Emissions from the combustion of stationary fuels, generation of and transmission and distribution losses of purchased electricity in sites owned by TWBC but leased and operated by another entity. b) Activity data is multiplied by DESNZ emissions factor. Where required EPC emissions data is also used. c) Invoices, energy bills, meter readings and EPC data. d) High.
Category 1	Upstream Leased Assets	a) Emissions from the combustion of stationary fuels, generation of and transmission and distribution losses of purchased electricity in sites owned by another entity but leased to TWBC. b) Activity data is multiplied by DESNZ emissions factor. Where required EPC emissions data is also used. c) Invoices, energy bills, meter readings and EPC data. d) Medium.

ISO Category	Emissions Source	a) Description and Rationale b) Calculation Methodology c) Data Source d) Uncertainty Risk
Category 3	Homeworking	<p>a) Emissions from the heating and electricity consumption associated with employees working from home.</p> <p>b) Activity data is multiplied by DESNZ emissions factor.</p> <p>c) Staff survey.</p> <p>d) Medium.</p>
Category 4	Stationary Combustion Fuels Well to Tank	<p>a) Emissions from the extraction, transportation and processing of raw materials resulting from the combustion of stationary fuels directly related to TWBC's operations.</p> <p>b) Activity data is multiplied by DESNZ emissions factors.</p> <p>c) Invoices, fuel receipts and EPC data.</p> <p>d) Low – Medium.</p>
Category 4	Vehicle Fleet Well to Tank	<p>a) Emissions from the extraction, transportation and processing of raw materials resulting from the mobile combustion of fuels directly related to TWBC's owned vehicle fleet.</p> <p>b) Activity data is multiplied by DESNZ emissions factors.</p> <p>c) Invoices and fuel receipts.</p> <p>d) Low.</p>
Category 4	Electricity Well to Tank	<p>a) Emissions from the extraction, transportation and processing of raw materials resulting from the generation of electricity purchased by TWBC.</p> <p>b) Activity data is multiplied by DESNZ emissions factors.</p> <p>c) Invoices, energy bills and EPC data.</p> <p>d) Low – Medium.</p>
Category 3	Business Travel Well to Tank	<p>a) Emissions from the extraction, transportation and processing of raw materials resulting from the transportation of employees for business related purposes, by transport means not owned or operated by TWBC.</p> <p>b) Activity data is multiplied by DESNZ emissions factor, and the DEFRA SIC Code emissions factors.</p> <p>c) Employee mileage and public transport claims and the staff survey.</p> <p>d) Medium.</p>
Category 3	Staff Commuting Well to Tank	<p>a) Emissions from the extraction, transportation and processing of raw materials resulting from the commute of employees by transport means not owned or operated by TWBC.</p> <p>b) Activity data is multiplied by DESNZ emissions factors.</p> <p>c) Staff survey.</p> <p>d) Medium.</p>
Category 5	Downstream Leased Assets Well to Tank	<p>a) Emissions from the extraction, transportation and processing of raw materials resulting from the combustion of stationary fuels, generation of and transmission and distribution losses of purchased electricity in sites owned by TWBC but leased and operated by another entity.</p> <p>b) Activity data is multiplied by DESNZ emissions factor. Where required EPC emissions data is also used.</p> <p>c) Invoices, energy bills, meter readings and EPC data.</p> <p>d) Medium.</p>
Category 6	Upstream Leased Assets Well to Tank	<p>a) Emissions from the extraction, transportation and processing of raw materials resulting from the combustion of stationary fuels, generation of and transmission and distribution losses of purchased electricity in sites owned by another entity but leased to TWBC.</p>

ISO Category	Emissions Source	a) Description and Rationale b) Calculation Methodology c) Data Source d) Uncertainty Risk
		<ul style="list-style-type: none"> <li>b) Activity data is multiplied by DESNZ emissions factor. Where required EPC emissions data is also used.</li> <li>c) Invoices, energy bills, meter readings and EPC data.</li> <li>d) Medium.</li> </ul>
Category 4	Supply Chain: Goods and Services	<ul style="list-style-type: none"> <li>a) Emissions from purchased services procured by TWBC.</li> <li>b) Emissions data obtained from external consultancy service Oxygen Finance.</li> <li>c) Invoices and Oxygen Finance.</li> <li>d) High.</li> </ul>
Category 4	Supply Chain: Purchasing Card	<ul style="list-style-type: none"> <li>a) Emissions from purchased products procured by TWBC.</li> <li>b) Activity data is multiplied by the DEFRA SIC Code emissions factors.</li> <li>c) Credit card receipts.</li> <li>d) High.</li> </ul>
Category 4	Tier 1 Contract: Waste Collection	<ul style="list-style-type: none"> <li>a) Emissions from the delivery of the waste collection and street cleaning contract, delivered by another entity, on behalf of TWBC.</li> <li>b) Activity data is multiplied by DESNZ emissions factors.</li> <li>c) Invoices and fuel receipts.</li> <li>d) Medium.</li> </ul>
Category 4	Tier 1 Contract: Leisure Centres	<ul style="list-style-type: none"> <li>a) Emissions from the operational delivery and running of the leisure centres, delivered by another entity, on behalf of TWBC.</li> <li>b) Activity data is multiplied by DESNZ emissions factors.</li> <li>c) Invoices, energy bills, meter readings and waste transfer notices.</li> <li>d) Medium.</li> </ul>
Category 4	Tier 1 Contract: Grounds Maintenance.	<ul style="list-style-type: none"> <li>a) Emissions from the delivery of the ground's maintenance contract, delivered by another entity, on behalf of TWBC.</li> <li>b) Activity data is multiplied by DESNZ emissions factors.</li> <li>c) Invoices, energy bills, meter readings and waste transfer notices.</li> <li>d) Low.</li> </ul>

Emissions boundary exclusions are detailed in appendix B.

### 3.1.3. Significance Criteria

TWBC has an established criteria to determine the significance of GHG emissions, for including within this GHG inventory. This criterion has been determined based on quantitative and qualitative thresholds.

#### Quantitative Threshold:

Individual GHG emissions sources that contribute  $\geq 1\%$  of TWBCs total emissions are considered to be significant and are therefore, included in full.

Sources that contribute  $< 1\%$  may still be included if they meet the qualitative threshold.

## Qualitative Threshold:

Individual GHG emissions sources are considered to be significant if they are any of the following:

- A statutory service or activity.
- Associated with stakeholder (councillor, resident, supply chain) concerns.
- Represent potential risk or opportunities.

Emissions sources that do not meet the above qualitative and quantitative thresholds may still be included in the GHG inventory on the grounds of completeness or best practise.

## 3.2. Quantification of GHG Emissions

### 3.2.1. Methodology

The quantification of greenhouse gas (GHG) emissions in this inventory has been undertaken in accordance with the principles and requirements of ISO 14064-1:2018.

TWBC has a calculation-based approach, whereby emissions are quantified by multiplying measured and estimated activity data with their relevant emission conversion factors. In the first instance, activity data is collected via primary sources, such as utility bills, fuel invoices, waste transfer notices, AMRs, half hourly consumption readings, manual meter readings, and staff surveys. Where primary sources cannot be used secondary data sources and estimations are used, with clear and documented assumptions.

To date, there has been no change to this approach when calculating GHG emissions previously.

This approach ensures that TWBC provides a consistent and transparent methodology for quantifying emissions from across its operations. Following the above quantification model ensures that annual emissions reports are reliable and comparable across multiple reporting periods.

### 3.2.2. Greenhouse Gases

The following GHGs are quantified as part of TWBC's GHG inventory: Carbon Dioxide (CO<sub>2</sub>), Methane (CH<sub>4</sub>) and Nitrous Oxide (N<sub>2</sub>O).

All GHG emissions are reported in metric tonnes of carbon dioxide equivalent (tCO<sub>2</sub>e). This is based on their global warming potential over 100 years, with the potential for each gas expressed in terms of CO<sub>2</sub>. This is consistent with the IPCC Fifth Assessment Report (AR5).

Sulphur hexafluoride (SF<sub>6</sub>), nitrogen trifluoride (NF<sub>3</sub>) and perfluorocarbons (PFCs) emissions are excluded from TWBC emissions inventory as these gases are not emitted in TWBC operations. TWBC does not engage in activities where these gases are typically present (e.g.

aluminium smelting, or semiconductor manufacturing). Furthermore, no leaks were identified in air conditioning units, resulting in no additional gasses released from F-Gas consumption.

### 3.2.3. GHG Conversion Factors

GHG conversion factors are sourced from the UK Government's official emissions conversion factor publications:

For this 2024/25 financial year inventory, 2024 emissions factors were used:

- [Greenhouse gas reporting: conversion factors 2024 - GOV.UK](#)

For supply chain emissions and certain transport emissions, SIC code emissions factors were used. The latest SIC code emissions factors are from 2022, therefore, they have been adjusted internally for inflation. Carbon Saver is used to identify these emissions factors:

- [carbonsaver.org/tools/scope\\_3\\_CO2e\\_factors.php](https://carbonsaver.org/tools/scope_3_CO2e_factors.php)

Carbon Saver use the following GHG emissions factors from the UK Government:

- [UK and England's carbon footprint to 2022 - GOV.UK](#)

In some circumstances, where energy data (kWh) cannot be estimated from EPCs, the EPC certificate emissions figure is used as an estimate for that building's emissions. EPCs are obtained from the following website:

- [Find an energy certificate - GOV.UK](#)

### 3.2.4. Data Uncertainty

TWBC has made every effort to ensure this report accurately reflects its greenhouse gas (GHG) emissions. However, some uncertainty is inevitable due to the emission factors applied, the activity data collected, and the quantification methodologies used.

#### Emission Conversion Factors

As noted in Section 3.2.3, all emission conversion factors are sourced from official government publications, which are outside TWBC's direct control. While these sources are considered reliable, a rare likelihood of uncertainty remains.

To improve accuracy, TWBC applies additional measures, such as adjusting spend-based emission factors for inflation. A significant proportion of TWBC's emissions are calculated using these spend factors.

#### Activity Data

Scope 1 and Scope 2 emissions are primarily quantified using physical unit methodologies supported by robust internal processes, resulting in low uncertainty overall. Scope 3 emissions

use a wider range of data sources and therefore have a higher likelihood of uncertainty. Uncertainty risk is indicated for each emissions source in section 4.2.1.

Scope 1:

- 97% of emissions data comes from high-quality sources with a low likelihood of uncertainty (high-quality metered and billed sources, subject to routine quality).
- 3% of emissions data comes from sources with a possible likelihood of uncertainty (estimates, partial primary data coverage, or manual processes).

Scope 2:

- 95% of emissions data comes from high-quality sources with a low likelihood of uncertainty.
- 5% of emissions data comes from sources with a possible likelihood of uncertainty.
- 

Scope 3:

- 37% of emissions data comes from sources with a low likelihood of uncertainty.
- 3% of emissions data comes from sources with a possible likelihood of uncertainty.
- 60% of emissions data comes from sources with a high likelihood of uncertainty (use of proxies, mixed sources, self-reported data or spend based data).

### Scope 3 Activity Data

There are several scope 3 emissions sources where uncertainties may present themselves through the quantification methodologies used. These are detailed below:

Emissions Source	Uncertainty Rationale
Business Travel	Exact distances are not known as staff use their own modes of transport and claim back mileage via expense claims. Staff are required to provide a VAT receipt from their most recent re-fuel, charge, or public transport journey; however, they do not indicate the exact amount spent of the journey. Staff therefore estimate their journey distance, which is then used as the claim. We can therefore estimate emissions based on the distance travelled and their vehicle type, size, and fuel. For public transport journeys, distance is not recorded, therefore, inflation adjusted spend factors are used.
Commuting	Our methodology uses average distances travelled to get to work, based on an average number of days in the office per week, extrapolated to average number of weeks work in a year, collected through a staff survey. Surveys do not get a 100% response rate, so the trends in the responses are extrapolated to the subset of staff that do not respond, to provide a more comprehensive overview of commuting emissions. There is a likely level of uncertainty due to this data being obtained through staff survey responses.
Downstream Leased Assets	TWBC does not have access to physical unit data from these assets, therefore, EPC energy data is used a proxy to determine approximate electricity and gas consumption for each asset. There is uncertainty due to the use of EPC data, where there is the possibility for inaccurate calculation, based on individual assessment of property rather than actual usage.

	Some data in this category relies on manual data entry and is therefore naturally open to a level of uncertainty. TWBC is looking into ways to reduce this uncertainty going forwards.
Upstream Leased Assets	TWBC does not have access to physical unit data from these assets, therefore EPC energy data is used a proxy to determine approximate electricity and gas consumption for each asset. There is uncertainty due to the use of EPC data, where there is the possibility for inaccurate calculation, based on individual assessment of property rather than actual usage.
Homeworking	Our methodology uses the average number of days in the office per week, extrapolated to average number of weeks worked in a year, collected through a staff survey. Surveys do not get a 100% response rate, so the trends in the responses are extrapolated to the subset of staff that do not respond, to provide a more comprehensive overview of homeworking emissions. There is a likely level of uncertainty due to this data being obtained through staff survey responses.
Supply Chain: Purchased Goods and Services	TWBC uses a spend based methodology, which therefore may not be a completely reflective measure of emissions associated with a good or service. TWBC mitigates this to a degree by applying an inflationary adjustment to spend factors and by collecting primary data from suppliers, as is done for tier 1 suppliers currently.
Supply Chain: Purchasing Card	TWBC uses a spend based methodology, which therefore may not be a completely reflective measure of emissions associated with a good or service. TWBC mitigates this to a degree by applying an inflationary adjustment to spend factors and by collecting primary data from suppliers, as is done for tier 1 suppliers currently.

# 4. TWBC Greenhouse Gas Emissions

## 4.1. GHG Emissions Inventory

Scope	Source	tCO <sub>2</sub> e	tCO <sub>2</sub>	tCH <sub>4</sub>	tN <sub>2</sub> O
1	Stationary Combustion Fuels	678.94	676.41	1.04	0.33
1	Vehicle Fleet	8.16	8.07	0.01	0.07
<b>1</b>	<b>Scope 1 Direct Total</b>	<b>687.09</b>	<b>684.48</b>	<b>1.05</b>	<b>0.40</b>
2	Electricity (Location Based)	723.42	716.01	3.14	4.26
<b>2</b>	<b>Scope 2 Indirect Total</b>	<b>723.42</b>	<b>716.01</b>	<b>3.14</b>	<b>4.26</b>
3	Transmission and Distribution Losses	63.94	63.28	0.28	0.38
3	Water Supply	2.55	-	-	-
3	Water Treatment	2.94	-	-	-
3	Waste Disposal	1.08	-	-	-
3	Business Travel	39.90	34.33	0.04	0.21
3	Business Travel T&D Losses	0.05	0.05	0.00	0.00
3	Commuting	281.80	280.08	0.41	1.32
3	Commuting T&D Losses	0.07	0.07	0.00	0.00
3	Downstream Leased Assets	414.96	409.93	1.07	1.37
3	Upstream Leased Assets	33.01	32.82	0.09	0.10
3	Homeworking	66.21	-	-	-
3	Stationary Combustion Fuels WTT	128.31	-	-	-
3	Vehicle Fleet WTT	2.11	-	-	-
3	Electricity WTT	174.24	-	-	-
3	Business Travel WTT	9.04	-	-	-
3	Commuting WTT	75.33	-	-	-
3	Downstream Leased Assets WTT	59.42	-	-	-
3	Upstream Leased Assets WTT	6.28	-	-	-
3	Supply Chain: Good and Services	3,330.38	-	-	-
3	Supply Chain: Purchasing Card	97.40	-	-	-
3	Tier 1 Contract: Waste Collection	948.70	753.04	0.09	9.98
3	Tier 1 Contract: Leisure Centres	975.54	815.52	2.04	1.91

Scope	Source	tCO <sub>2</sub> e	tCO <sub>2</sub>	tCH <sub>4</sub>	tN <sub>2</sub> O
3	Tier 1 Contract: Grounds Maintenance	91.90	72.20	0.05	0.85
<b>3</b>	<b>Scope Indirect 3 Total</b>	<b>6,805.14</b>	<b>2,461.31</b>	<b>4.07</b>	<b>16.13</b>

TWBC Gross Emissions	tCO <sub>2</sub> e	tCO <sub>2</sub>	tCH <sub>4</sub>	tN <sub>2</sub> O
<b>TWBC Total Gross Emissions</b>	8,215.65	3,861.81	8.27	20.79
TWBC Total Gross Direct Emissions	687.09	684.48	1.05	0.40
TWBC Total Gross Indirect Emissions	7,528.56	3,177.32	7.22	20.39

## Out of Scope Emissions

Scope	Source	tCO <sub>2</sub> e	tCO <sub>2</sub>	tCH <sub>4</sub>	tN <sub>2</sub> O
n/a	Stationary Combustion Fuels	73.55	73.55	n/a	n/a
n/a	Vehicle Fleet	0.51	0.51	n/a	n/a
n/a	Electricity	402.05	402.05	n/a	n/a
n/a	T1 Contract: Waste Collection	48.59	48.59	n/a	n/a
n/a	T1 Contract: Leisure Centres	142.44	142.44	n/a	n/a
n/a	T1 Contract: Grounds Maintenance	4.64	4.64	n/a	n/a

TWBC Out of Scope Emissions	tCO <sub>2</sub> e	tCO <sub>2</sub>	tCH <sub>4</sub>	tN <sub>2</sub> O
Total Out of Scope Emissions	671.78	671.78	n/a	n/a

Please see appendix A for the full ISO 14064-1 category emissions inventory.

## 4.2. Scope 1

Scope 1 emissions totalled at **687.09** tCO<sub>2</sub>e.

Stationary combustion fuels were the largest contributor, emitting **678.94** tCO<sub>2</sub>e, of which gas consumption alone emitted 677.10 tCO<sub>2</sub>e.

Scope 1 was the smallest contributor to overall gross emissions, contributing only 8.4%.

## 4.3. Scope 2

Scope 2 emissions totalled at **723.42** tCO<sub>2</sub>e.

Electricity consumption from facilities and streetlighting were the largest contributor, emitting 722.87 tCO<sub>2</sub>e.

Scope 2 was the second smallest contributor to TWBCs gross emissions, contributing 8.8%.

## 4.4. Scope 3

Scope 3 emissions totalled at 6,805.14 tCO<sub>2</sub>e.

The largest contributor to these emissions was TWBC's supply chain, specifically the goods and services procured, emitting 3,330.38 tCO<sub>2</sub>e. This was also the single largest source of emissions from TWBC GHG inventory, making up 41.7% of TWBCs emissions alone. TWBCs tier 1 contracts were also significant emitters, with the leisure centre contract and waste collection contract emitting 975.54 tCO<sub>2</sub>e and 948.70 tCO<sub>2</sub>e, respectively.

Scope 3 contributed 82.8% to TWBCs gross emissions.

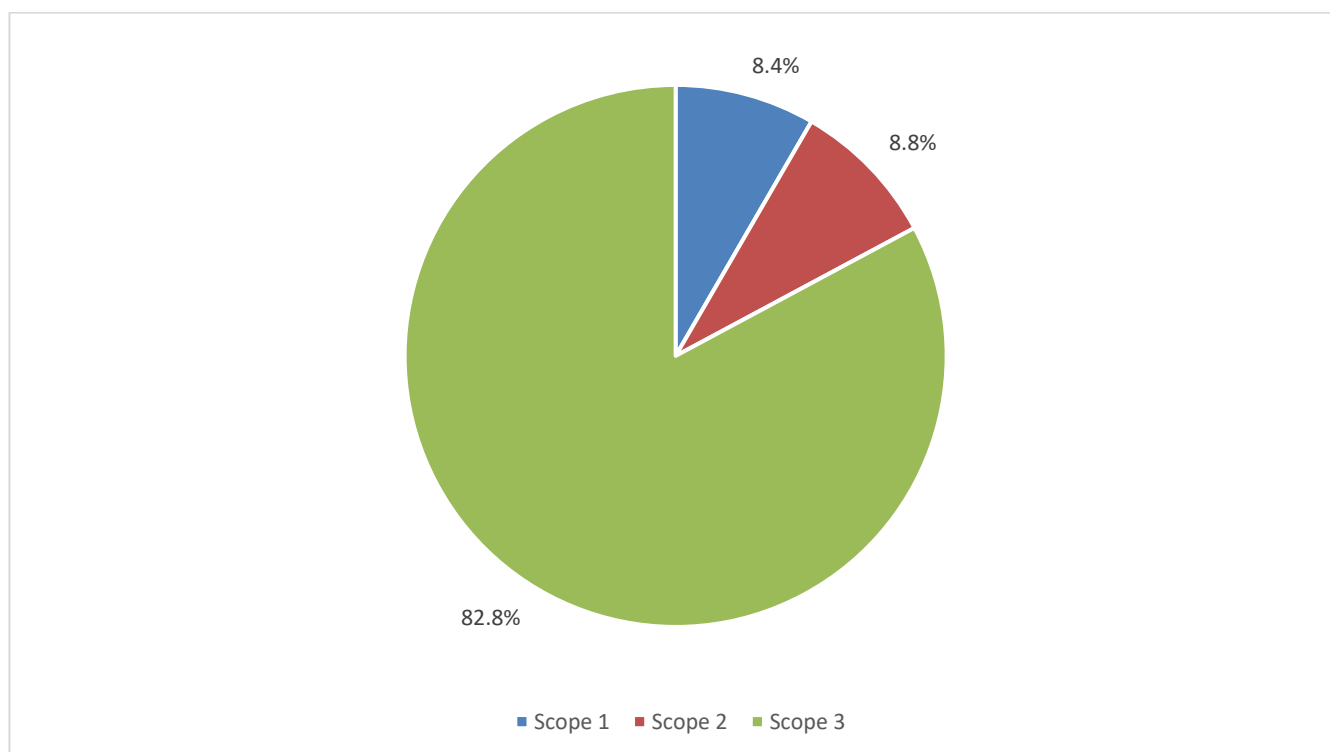


Figure 1: TWBC GHG Emissions Scope Contribution

## 4.5. Out of Scope Biogenic Emissions

TWBC reports its out-of-scope emissions, given the use of biofuel across the estate. This is included to ensure that we align with best practise reporting, as detailed by the Greenhouse Gas Protocol. The Department for Energy Security and Net Zero (DESNZ) define out of scope emissions as:

*“Outside of scopes includes biogenic CO<sub>2</sub> factors that should be used to account for the direct carbon dioxide (CO<sub>2</sub>) impact of burning biomass and biofuels, including when reporting emissions from electricity consumption. Biogenic CO<sub>2</sub> emissions are one of several activities labelled ‘outside of scopes’ by the GHG Protocol Corporate Accounting and Reporting Standard because the Scope 1 impact of these fuels has been determined to be a net ‘0’ (since the fuel source itself absorbs an equivalent amount of CO<sub>2</sub> during the growth phase as the amount of CO<sub>2</sub> released through combustion).”*

Out of scope biogenic emissions totalled at **671.78 tCO<sub>2</sub>e**.

## 4.6. Top 10 Emissions Sources

Emissions Scope	Emissions Source	tCO <sub>2</sub> e	Percentage Contribution
Scope 3	Supply Chain: Goods and Services	3,330.38	40.5%
Scope 3	Tier 1 Contract: Leisure Centres	975.54	11.9%
Scope 3	Tier 1 Contract: Waste Collection	948.70	11.5%
Scope 2	Electricity	715.47	8.7%
Scope 1	Gas	677.10	8.2%
Scope 3	Downstream Leased Assets	414.96	5.1%
Scope 3	Commuting	281.80	3.4%
Scope 3	Electricity Well to Tank	174.24	2.1%
Scope 3	Gas Well to Tank	111.84	1.4%
Scope 3	Supply Chain: Purchasing Card	97.40	1.2%

## 4.7. Top 10 Facilities by Carbon Emissions

TWBC Facility	Electricity Consumption (kWh)	Gas Consumption (kWh)	Water Consumption (m <sup>3</sup> )	tCO <sub>2</sub> e
Tunbridge Wells Sports Centre	759,115.8	2,616,119.5	13,053.0	778.24
Royal Victoria Place	1,200,386.3	416,675.7	4,557.7	420.71
Tunbridge Wells Town Hall	176,064.0	1,243,398.0	1,044.0	313.78
Kent & Sussex Crematorium	105,223.0	1,144,013.0	-	272.76
The Amelia Scott	335,920.0	472,645.0	1,316.0	193.61
The Weald Sports Centre	367,159.3	211,899.1	995.0	145.92

TWBC Facility	Electricity Consumption (kWh)	Gas Consumption (kWh)	Water Consumption (m <sup>3</sup> )	tCO <sub>2</sub> e
Tunbridge Wells Streetlighting	215,267.0	-	-	59.25
Putlands Sports & Leisure Centre	111,600.5	127,262.5	513.0	58.07
Assembly Hall Theatre	205,070.0	-	-	56.44
Crescent Road Car Park	148,701.0	-	-	40.93

## 4.8. Top 10 Facilities by Electricity Consumption

TWBC Facility	Electricity Consumption (kWh)	tCO <sub>2</sub> e
Royal Victoria Place	1,200,386.3	330.37
Tunbridge Wells Sports Centre	759,115.8	216.30
The Amelia Scott	335,920.0	92.45
The Weald Sports Centre	367,159.3	87.54
Tunbridge Wells Streetlighting	215,267.0	59.25
Assembly Hall Theatre	205,070.0	56.44
Tunbridge Wells Town Hall	176,064.0	48.46
Crescent Road Car Park Lighting	148,701.0	40.93
North Farm Lane Depot	141,460.0	38.93
Putlands Sports & Leisure Centre	111,600.5	30.78

## 4.9. Top 10 Facilities by Gas Consumption

TWBC Facility	Gas Consumption (kWh)	tCO <sub>2</sub> e
Tunbridge Wells Sports Centre	2,616,119.5	557.52
Tunbridge Wells Town Hall	1,243,398.0	264.98
Kent & Sussex Crematorium	1,144,013.0	243.80
The Amelia Scott	472,645.0	100.73
Royal Victoria Place	416,675.7	88.80
The Weald Sports Centre	211,899.1	45.16

TWBC Facility	Gas Consumption (kWh)	tCO <sub>2</sub> e
The Camden Centre	142,688.0	30.41
Putlands Sports & Leisure Centre	127,262.5	27.12
TN2 Community Centre	72,480.0	15.45
Cemetery Lodge	36,892.0	7.86
The Wesley Centre	36,702.0	7.82

## 4.10. GHG Removals

There were no GHG emissions removals in this reporting period.

## 4.11. Intensity Measurement

As of 31/03/2025 there were 340 members of staff employed by TWBC.

TWBCs carbon intensity is therefore, 24.16 tCO<sub>2</sub>e per employee.

# 5. Additional Information

## 5.1. Management and Monitoring Procedures

TWBC has a specific information management procedure in place to ensure that data is collected, managed, and stored to ensure continued accuracy.

In brief, the Sustainability Team is responsible for collecting emissions-related data from council officers, third-party suppliers, and internal finance, transport, and utilities management portals. All data is gathered in its raw form, categorised into defined emissions groups, and stored as raw data virtually. Where multiple sources exist within a category, a consolidation or analysis spreadsheet is prepared.

The team reviews and compiles all the raw data into the annual GHG inventory, stored in a designated emissions year folder using consistent naming convention (e.g., “TWBC Emissions Report 24-25”). Government emissions factors are similarly archived within the relevant year’s folder. In alignment with the BSI Net Zero Pathway, an annual GHG inventory is to undergo independent audit every three years. Following audit, finalised reports are clearly marked “FINAL” and exported to PDF for dissemination. All documentation associated with each year’s GHG emissions inventory are archived for record-keeping and compliance.

The Sustainability Team ensures data accuracy by cross-checking excel exports against raw data before including them in the GHG emissions inventory, resolving any discrepancies with data owners. Utility data from portals is verified through two reports run at least two months apart after the financial year to capture refinements, while third-party emissions data is checked against primary sources to avoid duplication and reduce uncertainty.

Annually, the team reviews the previous report and base year for boundary changes, recalculating if thresholds are exceeded, and documents any new issues or assumptions during data collection. After completing the inventory, a review with data owners identifies process improvements and opportunities to replace secondary data with primary sources, establishing timelines for implementation.

## 5.2. Offsetting

No offsetting has taken place, or offsets purchased for this 2024-25 GHG emissions inventory.

## 5.3. External Assurance Statement

This report has been externally verified by the British Standards Institution and prepared in accordance with the principles of ISO 14064-1:2018 to ensure the information provided is materially correct. The BSI Verification Opinion Statement is included in Appendix C.

# Appendix A: ISO 14064-1 Category Report

TWBC GHG Emissions Inventory		Notes	tCO <sub>2</sub> e	tCO <sub>2</sub>	tCH <sub>4</sub>	tN <sub>2</sub> O
<b>Direct GHG Emissions</b>			<b>687.09</b>	<b>684.48</b>	<b>1.05</b>	<b>0.40</b>
1	Category 1: Direct GHG emissions and removals		<b>687.09</b>	<b>684.48</b>	<b>1.05</b>	<b>0.40</b>
	1.1. Stationary combustion		678.94	676.41	1.04	0.33
	1.2. Mobile combustion		8.16	8.07	0.01	0.07
<b>Indirect GHG Emissions</b>			<b>7,528.56</b>	<b>3,177.32</b>	<b>7.22</b>	<b>20.39</b>
2	Category 2: Indirect GHG emissions from imported energy		<b>723.42</b>	<b>716.01</b>	<b>3.14</b>	<b>4.26</b>
	2.1. Purchased imported electricity	1	723.42	716.01	3.14	4.26
3	Category 3: Indirect GHG emissions from transportation		<b>472.39</b>	<b>314.53</b>	<b>0.45</b>	<b>1.53</b>
	3.1. Business travel	2	48.98	34.37	0.04	0.21
	3.2. Employee commuting	3	357.20	280.15	0.41	1.32
	3.3. Employee homeworking		66.21	-	-	-
4	Category 4: Indirect GHG emissions associated with the use of products by the organisation		<b>5,858.37</b>	<b>1,736.85</b>	<b>2.55</b>	<b>13.23</b>
	4.1. Purchased goods and services	4	5,815.07	1,704.04	2.46	13.13
	4.2. Disposal of solid and liquid waste		4.02	-	-	-
	4.3. Upstream leased assets (as lessee)	5	39.29	32.82	0.09	0.10
5	Category 5: Indirect GHG emissions associate with the use of products from the organisation		<b>474.38</b>	<b>409.93</b>	<b>1.07</b>	<b>1.37</b>
	5.1. Downstream leased assets (as lessor)	6	474.38	409.93	1.07	1.37

6	Category 6: Other indirect GHG emissions sources	-	-	-	-
		-	-	-	-
<b>Total Emissions Category 1 - 6</b>		<b>8,215.65</b>	<b>3,861.81</b>	<b>8.27</b>	<b>20.79</b>
<b>GHG Emissions Removals</b>					
	Direct Removals in tCO <sub>2</sub> e	-	-	-	-
<b>Carbon Financial Instruments</b>					
	Total renewable energy purchased in kWh	-	-	-	-
	Renewable energy purchase in kWh with contractual instruments compliant with ISO14064-1 Annex E	-	-	-	-
	Renewable energy purchase in kWh with contractual instruments not compliant with ISO14064-1 Annex E	-	-	-	-
	Offsets from any GHG scheme in tCO <sub>2</sub> e	-	-	-	-
<b>Other Related Information</b>					
	Performance tracking (emissions and removals by metric e.g. tCO <sub>2</sub> e)	See report.	-	-	-
	Base year GHG emissions, removals, stocks; and adjustments to base year	See report.	-	-	-
	Disclosure of most significant emissions sources, sinks, and reservoirs	See report.	-	-	-
	Statement of emissions (CO <sub>2</sub> e) per unit of relevant units	See report.	-	-	-
	Significance criteria	See report.	-	-	-
	Uncertainty assessment	See report.	-	-	-

## Notes

- 1 Location based and inclusive of electric vehicle fleet charging and data centre.
- 2 Inclusive of T&D losses and well to tank emissions.
- 3 Inclusive of T&D losses and well to tank emissions.
- 4 Inclusive of T&D losses and well to tank emissions.
- 5 Inclusive of T&D losses and well to tank emissions.
- 6 Inclusive of T&D losses and well to tank emissions.

TWBC GHG Biogenic Emissions Inventory		Notes	tCO <sub>2</sub> e	tCO <sub>2</sub>	tCH <sub>4</sub>	tN <sub>2</sub> O
<b>Direct GHG Emissions</b>			<b>74.06</b>	<b>74.06</b>	-	-
1	Category 1: Direct GHG emissions and removals		<b>74.06</b>	<b>74.06</b>	-	-
	1.1. Stationary combustion		73.55	73.55	-	-
	1.2. Mobile combustion		0.51	0.51	-	-
<b>Indirect GHG Emissions</b>			<b>597.72</b>	<b>597.72</b>	-	-
2	Category 2: Indirect GHG emissions from imported energy		<b>402.05</b>	<b>402.05</b>	-	-
	2.1. Purchased imported electricity		402.05	402.05	-	-
3	Category 3: Indirect GHG emissions from transportation		-	-	-	-
	3.1. Business travel		-	-	-	-

	3.2. Employee commuting	-	-	-	-
	3.3. Employee homeworking	-	-	-	-
4	Category 4: Indirect GHG emissions associated with the use of products by the organisation	<b>195.67</b>	<b>195.67</b>	-	-
	4.1. Purchased goods and services	195.67	195.67	-	-
	4.2. Disposal of solid and liquid waste	-	-	-	-
	4.3. Upstream leased assets (as lessee)	-	-	-	-
5	Category 5: Indirect GHG emissions associate with the use of products from the organisation	-	-	-	-
	5.1. Downstream leased assets (as lessor)	-	-	-	-
6	Category 6: Other indirect GHG emissions sources	-	-	-	-
		-	-	-	-
	<b>Total Biogenic Emissions Category 1 - 6</b>	<b>671.78</b>	<b>671.78</b>	-	-

# Appendix B: Boundary Exclusions

Source Excluded	Description and Rationale
Domestic Waste Disposal	<p>Domestic, public, and street cleaning waste disposal, collected through the waste collection and street cleaning contract. We have excluded these emissions from scope as per part II section 30, (3), (a) of the Environmental Protection Act (EPA) 1990 <i>'the following authorities are waste collection authorities – for any district in England ... not within Greater London, the council of the district'</i>. Tunbridge Wells Borough Council is therefore a waste collection authority.</p> <p>Kent County Council (KCC) is the local waste disposal authority (<i>EPS 1990, part II, section 30, (2), (a)</i>). Waste is transferred from waste collection trucks to KCC owned and operated sites, at this point it is KCCs responsibility to sort and dispose of the waste. Emissions from this process are captured within KCCs emissions reporting. Furthermore, TWBC is not responsible for the waste produced by residents and on the roads, only the collection of it. Therefore, it is TWBCs position that only the emissions associated with the collection of the waste fall within the operational boundary, as TWBC has the power to determine how waste is collected.</p>
Biogenic CO <sub>2</sub> Emissions	<p>Biogenic CO<sub>2</sub> emissions are not included within scope of TWBCs emissions. However, these are reported separately as 'out of scope' emissions in the inventory. Biogenic CO<sub>2</sub> emissions refer to the impact of burning biomass and biofuels (including electricity, petrol, and diesel). However, as per the GHG Protocol Corporate Accounting and Reporting Standard, these are not reported in scope, because the scope 3 impact of these fuels has been determined to be net zero (the fuel source itself absorbs an equivalent amount of CO<sub>2</sub> during the growth phase as the amount of CO<sub>2</sub> released through combustion).</p>
Land Use and Land Use Change	<p>Land use and land use change emissions are excluded from TWBC's emissions inventory, due to a lack of accurate data.</p>
Fugitive Emissions	<p>Fugitive Emissions from TWBC air conditioning systems. TWBC's air conditioning systems are regularly maintained by our term maintenance contractor. Any F-gas refills required will be raised via an invoice, of which no such invoice has been raised for the 24/25 financial year. As such, no emissions have been recorded for this source.</p> <p>This source is not considered significant, given the limited air conditioning units in use.</p>
Schools Emissions	<p>Emissions arising from the operation of schools in the borough are excluded as responsibility for schools sits with Kent County Council, rather than TWBC.</p>
Councillor Commuting Travel	<p>Councillor commuting travel emissions are excluded from TWBC's emissions as there is no reliable data collected for the source.</p> <p>This source is not considered significant.</p>
Parks Green Waste Composting	<p>Green waste composting emissions arising from the grounds maintenance contract is excluded from TWBCs emissions scope. Waste composting is delivered on site (at TWBC park). Therefore, the waste is not weighed prior to composting, resulting in no available data for calculations.</p> <p>This source is not considered significant.</p>
Select Property Electricity and Gas Consumption	<p>Electricity and gas consumption emissions from the below facilities are excluded from scope due to lack of primary data or a relevant proxy to develop estimates (e.g. EPC certificates).</p>

Source Excluded	Description and Rationale
	<ul style="list-style-type: none"> <li>• Downstream Leased Assets               <ul style="list-style-type: none"> <li>○ TWBC Leased Properties (TWBC Lessor)                   <ul style="list-style-type: none"> <li>▪ The Forum</li> <li>▪ 59 St Johns Road</li> <li>▪ Culverden Stadium</li> <li>▪ Rifle Club, Warwick Park</li> </ul> </li> </ul> </li> </ul> <p>These sources are not considered significant.</p>
Select Property Water Supply and Treatment	<p>Water supply and treatment emissions from the below facilities are excluded from scope due to lack of primary data or a relevant proxy to develop estimates (e.g. EPC certificates).</p> <ul style="list-style-type: none"> <li>• Corporate Assets               <ul style="list-style-type: none"> <li>○ Temporary Accommodation</li> </ul> </li> <li>• Downstream Leased Assets               <ul style="list-style-type: none"> <li>○ Temporary Accommodation</li> <li>○ Tunbridge Wells Property Holdings</li> <li>○ TWBC Commercial Investment Portfolio</li> </ul> </li> <li>• Upstream Leased Assets               <ul style="list-style-type: none"> <li>○ Temporary Accommodation</li> </ul> </li> </ul> <p>These sources are not considered significant.</p>
Ad Blue Consumption	<p>Ad Blue is consumed across several vehicles in the fleet and in contractor fleets. There is no confirmed emissions factor for Ad Blue, therefore, this source is excluded.</p> <p>This source is not considered significant.</p>
Ad Hoc Waste Disposal	<p>TWBC conduct ad hoc waste disposal of bulky items such as fridges and freezers. However, there is no waste tonnage data available on the waste transfer notices to accurately convert these sources into emissions data.</p> <p>This source is not considered significant.</p>

# Appendix C: Version Control

<b>Document Name</b>	Greenhouse Gas Emissions Report 2024-2025
<b>Responsible Officer</b>	Henry Saunders, Sustainability Manager


<b>Version Number</b>	<b>Reason for Review</b>	<b>Author(s)</b>	<b>Date</b>
1.0	First Version.	H. Saunders, Sustainability Manager.	16.12.2025
2.0	Updated following BSI ISO 14064-1 Stage 1 review.	H. Saunders, Sustainability Manager.	23.12.2025
3.0	Updated following BSI ISO 14064-1 Stage 2 review.	H. Saunders, Sustainability Manager.	08.01.2026
4.0	Updated to include BSI Verification Opinion Statement.	H. Saunders, Sustainability Manager.	18.02.2026

# Appendix D: BSI Verification Opinion Statement

*The BSI Verification Opinion Statement is presented in full on the following page of this report.*



## Verification Opinion

Verified with Comments	
Based on the process and procedures conducted, the GHG statement contained in the GHG Report TWBC Emissions Report 24-25 v.03 produced by Tunbridge Wells Borough Council:	<ul style="list-style-type: none"> <li>Is materially correct and is a fair representation of GHG data and information.</li> <li>Has been prepared in accordance with ISO14064-1:2018</li> </ul>
With the following caveats	<ul style="list-style-type: none"> <li>The purchased goods and services data could only verify financial input data to the Oxygen finance model. The verification team did not have access to the emission factors used or the methodology. A comparison was undertaken as part of the verification process and showed the oxygen finance model did not appear to be under reporting when compared to the Defra SIC code emission factors and an inflationary factor.</li> <li>There are 0 entries and gaps in data for the Waste Transport Operations for which there are no traceable explanations to verify the 0 values.</li> </ul>
The following improvements were raised in relation to future reporting	<ul style="list-style-type: none"> <li>More data logging to cover seasonal variations at data centre would improve accuracy of electricity data.</li> <li>The internal expense system does not capture the type of transport or distance covered for expense claims where staff have travelled by public transport - emissions are estimated using spend based, inflation adjusted SIC codes. Capture of actual distance and mode of transport will improve the accuracy of this data.</li> <li>Vehicles move in and out of the waste contract due to sharing with another council. Movement is informal and difficult to trace.</li> </ul>
Lead Verifier	Pete Stevens
Independent Reviewer	Sarath Mohan
Signed on behalf of BSI	 Matt Page, Senior Vice President, EMEA Assurance
Issue Date	9 <sup>th</sup> February 2026
BSI Assurance UK Ltd, Kitemark Court, Davy Avenue, Milton Keynes, MK5 8PP, UK	
NOTE: BSI Assurance UK Ltd is independent to and has no financial interest in Tunbridge Wells Borough Council. This 3 <sup>rd</sup> party Verification Opinion has been prepared for Tunbridge Wells Borough Council only for the purposes of verifying its statement relating to its GHG emissions described in the scope above. It was not prepared for any other purpose. In making this Statement, BSI Assurance UK Ltd has assumed that all information provided to it by Tunbridge Wells Borough Council is true, accurate and complete. BSI Assurance UK Ltd accepts no liability to any third party who places reliance on this statement.	

**Verification Opinion Reference:** CFV 829611 9022026





## Verification Engagement

Organization	Tunbridge Wells Borough Council
Responsible party	Tunbridge Wells Borough Council
Verification Objectives	To express an opinion on whether the organizational GHG Statement which is historical in nature: <ul style="list-style-type: none"><li>• Is accurate, materially correct and is a fair representation of GHG data and information.</li><li>• Has been prepared in accordance with ISO14064-1:2018 the criteria used by BSI to verify the GHG Organizational Statement</li></ul>
Materiality Level	5%
Level of Assurance	Reasonable
Verification evidence gathering procedures	<ul style="list-style-type: none"><li>• Evaluation of the monitoring and controls systems through interviewing employees' observation &amp; inquiry</li><li>• Verification of the data through sampling recalculation, retracing, cross checking, and reconciliation</li></ul>
Verification Standards	The verification was carried out in accordance with ISO 14064-3:2019, ISO 14065:2020 and ISO 17029:2019
Note: Tunbridge Wells Borough Council is responsible for the preparation and fair presentation of the GHG statement and report in accordance with the agreed criteria. BSI Assurance UK Ltd is responsible for expressing an opinion on the GHG statement based on the verification.	



## Organizational GHG Statement

Organization		Tunbridge Wells Borough Council Town Hall Mount Pleasant Road Tunbridge Wells TN1 2RS United Kingdom
Organizations GHG Report containing GHG Statement		TWBC Emissions Report 24-25 v.03
Organizational Boundary		Operational Control
Locations included in the Organizational Boundary <i>(if boundary is only the one site listed above this row can be removed)</i>		See Appendix A
Scope of activities:		Tunbridge Wells Borough Council (TWBC) is a local authority located in the South-East of England. Responsibilities include (but are not limited to) waste collection, planning applications, council tax collections, leisure provision, grounds maintenance, environmental health, public infrastructure, and private sector housing.
Reporting Boundary:	Direct GHG Emissions (Scope 1)	<ul style="list-style-type: none"> <li>Stationary combustion fuels</li> <li>Vehicle fleet</li> </ul>
	Direct GHG Removals (Scope 1)	<ul style="list-style-type: none"> <li>None</li> </ul>
	Indirect GHG Emissions from imported energy (Scope 2)	<ul style="list-style-type: none"> <li>Electricity</li> </ul>
	Indirect GHG emissions from transportation (Scope 3)	<ul style="list-style-type: none"> <li>Business travel</li> <li>Employee commuting</li> <li>Employee homeworking</li> </ul>
	Indirect GHG emissions from products used by organization (Scope 3)	<ul style="list-style-type: none"> <li>Purchased goods and services</li> <li>Disposal of solid and liquid waste</li> <li>Upstream leased assets (as Lessee)</li> </ul>
	Indirect GHG emissions associated with the use of products from the organization (Scope 3)	<ul style="list-style-type: none"> <li>Downstream Leased Assets (as Lessor)</li> </ul>
	Indirect GHG emissions from other sources (scope 3)	n/a
Exclusions from Reporting Boundary:		<ul style="list-style-type: none"> <li>Domestic waste disposal – Waste Disposal Authority (Kent County Council) is responsible for this</li> <li>Biogenic emissions are excluded but reported as out of scope</li> <li>Land use and land use change – lack of accurate data</li> <li>Fugitive emissions – no emissions in period</li> <li>School emissions – Part of Kent County Councils responsibility</li> <li>Councillor commuting travel – not significant</li> <li>Parks green waste composting – no available data</li> </ul>



	<p>and not significant</p> <ul style="list-style-type: none"><li>• Selected property locations The forum, 59 St Johns Road, Culverden Stadium, Rifle club lack of primary and proxy data and not significant</li><li>• Adblue – not significant</li><li>• Ad hoc waste disposal – not significant</li></ul>
Criteria for developing the organizational GHG Inventory:	ISO14064-1:2018
Reporting Period	1 <sup>st</sup> April 2024-31 <sup>st</sup> March 2025



Category	tCO <sub>2</sub> e
Scope 1	
<b>Category 1: Direct GHG emissions and removals</b>	<b>687.09</b>
Scope 2	
<b>Category 2: Indirect GHG emissions from imported energy</b>	<b>723.42</b>
Scope 3	
Category 3: Indirect GHG emissions from transportation	472.39
Category 4: Indirect GHG emissions from products used by an organisation	5,858.37
Category 5: Indirect GHG emissions associated with the use of products from the organisation	474.38
<b>Scope 3 totals</b>	<b>6805.14</b>
<b>Total all scopes</b>	<b>8215.65</b>

**N.B. No market based reporting was used.**



## Appendix A

Address 1	Address 2	Post Code
The Amelia Scott	Mount Pleasant Road	TN1 1JN
Tunbridge Wells (Dusk-Dawn)	Street lighting	n/a
Assembly Hall	Crescent Road	TN1 2LU
Tunbridge Wells Town Hall	Mount Pleasant Road	TN1 1RS
Crescent Road Car Park Lighting	Crescent Road	TN1 2LY
North Farm Lane Depot	North Farm Lane	TN2 3EE
Kent & Sussex Crematorium	Benhall Mill Road	TN2 5JJ
Dowding House Landlord supply	1 Dowding House, Commercial Road	TN12 6DP
Flat 1,2,3,7,8,9,11,12,14,15,16,17,18, 19,20,22,23,24,26,27,28 Dowding House	Commercial Road	TN12 6DP
Torrington Development - Car Park	Vale Road	TN1 1BT
Car Park	Great Hall Arcade	TN1 1QQ
Cinderhill Gypsy Site	Matfield	TN12 7EF
Caverley Grounds	Adjacent to Café	TN1 1QY
Cricket Pavilion Nevill Ground	Warwick Park	TN2 5ET
The Camden Centre	Market Square	TN1 2SW
Bowls Pavilion	Bowls Pavilion	TN1 2HU
Car Park - TN2 5BF	Car Park - TN2 5BF	TN2 5BF
Tbs Supply Hawkenbury Pavilion	Sherbourne Close	TN2 5BW
Cemetery Chapel	Benhall Mill Road	TN2 5JH
TN2 Community Centre	Greggs Wood Road	TN2 3JG
Crescent Road Units	Crescent Road	TN1 2LZ
Pantiles Car Park (EV Charging and Lighting)	The Potteries	TN2 5FR
Dunorlan Park	Halls Hole Road	TN2 4UA
Unmetered Supply - CCTV	CCTV	n/a
Bowls Pavilion Calverley Ground	Mountfield Road	TN1 1SG
30 Crescent Road	30 Crescent Road	TN1 2LZ
32 Crescent Road	32 Crescent Road	TN1 2LZ
33 Crescent Road Unit	Crescent Road	TN1 2LZ
Assembly Hall Kitchen	Monson Way	TN1 1LQ
Oast House	Oast House	TN2 3SE
Floodlighting Hawkenbury	Hawkenbury Road	TN2 5BJ
40 Hunters Way	Tunbridge Wells	TN2 5QF
Tunbridge Wells (Continuous)	Street lighting	UM5 1SS
Rusthall Pavilion	Southwood Road	TN4 8SN
Calverley Terrace	Basement offices	TN1 2LU
St Johns Recreation Ground	Beltring Road	TN4 9UA
Public Conveniences	Calverley Grounds	TN1 1QY
9 - 10 Calverley Terrace	9 - 10 Calverley Terrace	TN1 2LU
Landlords Supply Apartments 1 to 5	2 John Street	TN4 9RU
35 Crescent Road	Crescent Road	TN1 2LZ
Conveniences	Dunorlan Park	TN2 3QA
Public Conveniences & Shelter	Mount Ephraim	TN4 8BS



New Pavilion Cadogan Playing fields	St Johns Road	TN4 9UY
Public Conveniences	Auckland Road	TN1 2HS
Public Conveniences	Commercial Road	TN12 6DP
Kiosk Cycle Path Lighting	6-53 Addison Road	TN2 3GG
Bayham Pavilion	Bayham Road	TN2 5HU
Wesley Centre - Community Store	Commercial Road, Paddock Wood	TN12 6DS
The Wesley Centre	Paddock Wood	TN12 6DS
36 Crescent Road Units	Mount Pleasant Road	TN1 2LZ
Unit 1 Corn Exchange	The Pantiles	TN2 5TE
Staircase Supply 58 London Road	58 London Road	TN4 OPR
L/Lords Supply - TN4 9TT	St. Johns Road	TN4 9TT
Staircase Lighting	Staircase Lighting	TN2 5PX
The Old Coach Park	Linden Park Road	TN2 5QL
Colebrook Pavilion Changing rooms	Apple Tree Lane	TN2 3BT
L/Lords Supply	61 The Pantiles, Royal Tunbridge Wells	TN2 5TE
2nd Floor 9/10 Calvery Terrace	Crescent Road	TN1 2LU
31 Crescent Road		TN1 2LZ
8 Dudley Road (Landlords Supply)	8 Dudley Road	TN1 1LF
Allotments	Eridge Road	TN4 8HR
Allotments	Dorking Road	TN1 2LP
Allotments	Woodland Road	
Assembly Hall Theatre	Crescent Road	TN1 2LU
Barnetts Wood Allotments	Adj.48 North Farm Rd	TN2 3DH
Bowls Green	Calverley Gardens	TN1 1QR
Cafe Dunorlan Park	Pembury Road	TN2 3QA
Calverley Grounds, Public Park		TN1 1RS
Cemetery Workshop	Benhall Mill Road	TN2 5JH
Charity Farm Allotments	Dorking Rd	TN1 2LP
Colebrook Pavillion	Apple Tree Lane	TN2 3BT
Crescent Road Car Park	Crescent Road	TN1 2LU
Dunorlan 2 Garden, & Conveniences	Pembury Road,	TN1 2XL
Events field	Halls Hole Road	TN2 4UA
Ferrars Allotments	Cornford Lane	TN2 4DR
Grosvenor Recreation	Rochdale Road	TN1 2JD
Grosvenor Recreation Ground Pavilion	Auckland Road	TN1 2HU
Grosvenor Recreation Ground Toilets	Dorking Road	TN1 2LP
Highway Drainage Public Conveniences At Car Park	Commercial Road	TN12 6DP
Hilbert Rec Allotments	Hilbert Rec	TN2 3SF
John Street Car Park	John Street	TN4 9RU
Linden Park Road Car Park	Linden Park Road	TN2 5QL
Lower Cemetery	Bayham Road	TN2 5HP
Mount Pleasant Avenue Car Park	Mount Pleasant	TN1 1QY
New Pavilion Hilbert, Recreation	Hilbert Road	TN2 3SF
Office	Mount Pleasant Road	TN1 1RS
Playing Fields	Pav & Crkt Grd	TN2 5EN



Playing Flds Cadogan Gardens		TN1 2UL
Prospective Depot T	North Farm Lane	TN2 3ED
Public Conv Wellington Rock	The Common	TN4 8BX
Public Conveniences	Calverley Gardens, Calverley Park	TN1 1QR
Public Conveniences	The Green	TN12 7JX
Public Conveniences	High Street	TN12 7NQ
Public Conveniences	The Street, Sissinghurst	TN17 2JD
Reynolds Lane Allotments	Reynolds Lane Allotments	TN4 9HG
Sandhurst Road Allotments	Sandhurst Road Allotments	TN2 3SZ
Sports Area	Hawkenbury Road	TN2 5BJ
Sports Pavilion	Bayham Road	TN2 5HU
Tennis Courts	Calverley Gardens	TN1 1QR
The Gateway	The Gateway	TN1 2AB
THE GROVE PLAY AREA		n/a
The Nevill Cricket Pavilion	Nevill Gate	TN2 5ES
Town Hall Yard Car Park	Monson Road	TN1 1LP
Tunbridge Wells Borough Council Upper Cemetery	Benhall Mill Road	TN2 5XH
Vale Avenue Part Of Car Park & Prems	Vale Avenue	TN1 1BT
Woodbury Park Cemetery	Woodland Road	TN4 9NW
Yew Tree road Car Park	Yew Tree road	TN4 0DB
Royal Victoria Place	Crescent Road	TN1 2SS
Tunbridge Wells Sports Centre	Johns Road	TN4 9TX
The Weald Sports Centre	Anglely Road, Cranbrook	TN17 2PJ
Putlands Sports & Leisure Centre	Mascalls Court Road, Paddock Wood	TN12 6NZ
1 Pennyfields	Cranbrook	TN17 3BZ
172 Sandhurst Road	Royal Tunbridge Wells	TN2 3TQ
19 Rankine Road	Royal Tunbridge Wells	TN2 3BJ
2 Southfield Road	Royal Tunbridge Wells	TN4 9UL
20 Claremont Road	Royal Tunbridge Wells	TN1 1SZ
24 Rankine Road	Royal Tunbridge Wells	TN2 3BH
2a Southfield Road	Royal Tunbridge Wells	TN4 9UL
30-36 Crescent Road	Royal Tunbridge Wells	TN1 2LZ
40 Church Road	Paddock Wood	TN12 6HB
58a-d London Road	Southborough	TN4 OPR
1,4,6,11,12,15,19 Rusthall Grange	Rusthall Road, Royal Tunbridge Wells	TN4 8PQ
11 Harries Road	Royal Tunbridge Wells	TN2 3TW
2 Walnut Way	Southborough	TN4 9XU
22 and 22a North Street	Royal Tunbridge Wells	TN2 4SS
41 Hornbeam Avenue	Southborough	TN4 9XT
59 Dudley Road	Royal Tunbridge Wells	TN1 1LE
65 Greggs Wood Road	Royal Tunbridge Wells	TN2 3JQ
80 Waterdown Road	Royal Tunbridge Wells	TN4 8LF
84 Simmonds Court	Gladstone Road, Rusthall	TN4 8SA
85 Greggs Wood Road	Royal Tunbridge Wells	TN2 3JQ

112 Simmonds Court	Gladstone Road, Rusthall	TN4 8SA
5e Rowan Tree Road	Royal Tunbridge Wells	TN2 5PX
5 Merrion Close	Royal Tunbridge Wells	TN4 9JJ
40 Hunters Way	Royal Tunbridge Wells	TN2 5QF
3a and 4a Rowan Tree Road	Royal Tunbridge Wells	TN2 5PX
57a and 59 The Pantiles	Royal Tunbridge Wells	TN2 5TE
8 (Flats 1 to 4) Dudley Road TN1 1LF	Royal Tunbridge Wells	TN1 1LF
Cemetery Lodge	Benhall Mill Road, Royal Tunbridge Wells	TN2 5JH
Crematorium Lodge	Benhall Mill Road, Royal Tunbridge Wells	TN2 5JH
25 Monson Road, Tunbridge Wells TN1 1LS	Royal Tunbridge Wells	TN1 1LS
Packs in the Woods	Hilbert Road, Royal Tunbridge Wells	TN2 3SE
2 (Flat 1-5) John Street	Royal Tunbridge Road	TN4 9RU
Grove Hill House (Apartments 10,13,18 and 23)	21-27 Grove Hill Road, Royal Tunbridge Wells	TN1 1SA
9-19 Colebrook Industrial Estate	Tunbridge Wells	TN2 3DG
The Wesley Centre - Food Bank	Commercial Road, Paddock Wood	TN12 6DS
The Wesley Centre - Front of Building	Commercial Road, Paddock Wood	TN12 6DS
29 Monson Road	Monson Road, Royal Tunbridge Wells	TN1 1LS
Rowan Tree Surgery 3a & 4a	Rowan Tree Road, Royal Tunbridge Wells	TN2 5PX
The Garden Hall Club	Wood Street, Royal Tunbridge Wells	TN1 2QS
65, 67 and 69 St Johns Road	Royal Tunbridge Wells	TN4 9TT
North Farm House	Dowding Way, Royal Tunbridge Wells	TN2 3UY
57,57a, 61, 61a,61b The Pantiles	Royal Tunbridge Wells	TN2 5TE
10,11 and 12 Sussex Mews	Tunbridge Wells, Kent	TN2 5QJ
8 Grosvenor Road	Royal Tunbridge Wells, Kent	TN1 2AB
33 Monson Road	Royal Tunbridge Wells	TN1 1LS

**N.B. It should be noted some sites such as allotments/play areas have no emissions associated with them but are within the organisations asset register.**