Carbon Reduction Plan

September 2026

Wealden Leisure Ltd trading as Freedom Leisure

Commitment to achieving Net Zero

Freedom Leisure is committed to achieving Net Zero emissions across our operations by 2030 or in alignment with our council partners' net zero target dates. We will work in partnership with councils to prioritise delivery through contract-level decarbonisation plans that reflect local priorities, funding opportunities and infrastructure requirements.

Our Environmental and Sustainability Strategy 2026-2030 sets out the actions we will take to deliver progress through improved energy efficiency, renewable energy and co-ordinated investment in low-carbon technologies.

Baseline Emissions Footprint

Freedom Leisure retains 2019/20 as its historic baseline year. The baseline includes the emissions sources reported at that time. Scope 3 coverage was limited to business travel and electricity transmission and distribution losses and therefore does not include the full subset of Scope 3 categories required for current Carbon Reduction Plan reporting.

Current reporting includes additional emission sources. Changes in reporting coverage and the size and composition of our operating portfolio are explained alongside the emissions tables. Whole organisation emissions, comparable-site performance and emission intensity are assessed separately to provide a transparent account of progress.

Baseline Year: 2019 / 2020

Our baseline emissions inventory includes all our measurable Scope 1, 2 and 3 emissions. Electricity and Gas kWh usage is compiled using half-hourly data wherever available from smart meters through Stark, supported by meter readings and supplier invoices. Business travel is calculated from business miles claimed for an average petrol vehicle and fuel card data for company maintenance vehicles. Where Freedom Leisure is not directly responsible for the procurement of utilities, the associated emissions for these supplies now sit under Scope 3, rather than being grouped into Scopes 1 and 2 as is the case for our baseline year.

Our Baseline Year Scope 3 emissions include electricity transmission and distribution and business travel.

We include all 7 Kyoto Protocol Greenhouse Gas groups in our emissions footprint calculations. Reporting of Emissions resulting from the use of grid electricity and natural gas was calculated using the UK Government GHG Conversion Factors for Company Reporting.

EMISSIONS	TOTAL (tCO_2e)
Scope 1	**16,865**
Scope 2	**7,184**
Scope 3 (Included Sources)	**878** Reported Scope 3 emissions relate to business travel and losses from the delivery of electricity through the grid. Freedom Leisure does not transport and distribute products.
Total Emissions	**24,927**

Current Emissions Reporting: 2025 / 2026

EMISSIONS	TOTAL (tCO_2e)
Scope 1	**15,818**
Scope 2	**5,166**
Scope 3 (Included Sources)	**4,337** Reported Scope 3 emissions relate to business travel and commuting undertaken by colleagues, operational waste, indirectly purchased electricity and gas, and losses from the delivery of electricity through the grid. Freedom Leisure does not transport and distribute products.
Total Emissions	**25,321**

Carbon Reduction Plan (cont.)

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Emissions reduction targets

During 2025/26, we continued to reduce energy demand through operational improvements, capital investment and collaboration with council partners.

Since our 2019/20 baseline, emission per customer visit have reduced by approximately 29%, from 0.00145 to 0.00103 tonnes of CO2e in 2025/26. (SECR boundary used to determine intensity)

Our operating portfolio has changed substantially over this period. We therefore report emission per customer visit alongside total emissions and comparable site performance to provide a clearer picture of progress. The reduction per visit demonstrates improved carbon efficiency, although it does not represent a 29% reduction in absolute emissions.

Across our comparable estate, combined Scope 1 and Scope 2 emissions have reduced by 27% against the 2019/20 baseline, falling from 22,450 to 16,394.01 tonnes CO2e in 2025/26.

For planning purposes, an indicative annual reduction of 10% would reduce our combined Scope 1 and Scope 2 emissions from 20,984 tonnes CO2e to approximately 12,391 tonnes CO2e by 2030/31, a reduction of 41%. This projection assumes a consistent operating portfolio and reporting boundary. Delivery would be supported by operational energy efficiency measures, renewable energy installations and decarbonisation projects agreed with our partners. The projection will be reviewed against contract delivery plans before adoption as a formal target.

Our strategy for 2026-2030 places measurable delivery at contract level at the centre of our approach.

Intensity ratio

The number and mix of facilities we operate my change from year to year, affecting our total emissions. We therefore also report emissions per customer visit to provide a normalised measure of performance across our changing estate.
(as per SECR 2025/26)

	2025 / 26	2024 / 25	2023 / 24	2019 / 20
Customer visits	23.53m	23.43m	22.5m	17.2m
Tonnes CO2e per visit	0.00103	0.00103	0.00105	0.00145



Carbon Reduction Initiatives

Energy Efficiency and Carbon Reduction Performance Highlights:

During 2025/26, Freedom Leisure continued to invest in energy efficiency and low carbon technologies across its estate. Operational energy management, targeted capital improvements and partnership working remained central to reducing demand and improving building performance.

Performance against the 2019/20 baseline is reported using comparable sites, alongside the whole-organisation emissions inventory. This distinguishes operational improvements from changes arising through portfolio growth and expanded emissions reporting.

While our overall carbon footprint has increased slightly by 271 tonnes CO2e compared to the previous financial year - largely reflecting our portfolio growth - if comparing the same sites from our portfolio today to their consumption in our baseline year, we are able to demonstrate significant environmental improvements.

- 19% reduction in gas consumption (kWh)
- CO2e emissions down by 6056 tonnes vs. 2019/20 baseline
- Tonnes CO2e per visit reduced by 29% since 2019/20 baseline:

These reductions demonstrate the positive impact of our low-energy strategy, capital interventions, and sustained operational focus.

Carbon Reduction Plan (cont.)

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Capital Interventions in 2025/26

To meet remaining energy demands responsibly, we continue to implement low and zero-carbon technologies alongside best practices in energy conservation. Key interventions this year include:

- Solar Photovoltaic (PV) installations at seven centres, with reported annual generation of almost one million kWh. Since the reporting year-end, further PV installations have been completed, with estimated combined generation of over one million kWh of renewable electricity per year.
- Ventilation plant upgrades to improve performance and reduce energy consumption.
- Replacement of pitch and sports hall lighting with energy-efficient LED systems.
- Installation of more efficient pool pumps with integrated variable speed drives.
- Pool heat exchanger upgrades to improve heating performance.
- Air - powered showers and backwash water recovery systems to reduce water consumption.
- New pool covers to reduce heat loss and heating demand.
- Continued replacement of boilers and other building assets with efficient technologies appropriate to each site.

Projects were supported through council partnerships and external funding programmes, including Sport England and Sport Wales.

Environmental management and operational efficiency

Our ISO 14001-certified Environmental Management System supports structured monitoring, review and continual improvement. Energy monitoring, consumption reporting, forecasting and operational standards help teams identify avoidable consumption and implement corrective actions. These activities complement capital investment by improving the operation of existing buildings and equipment.

Environmental awareness and training

All new colleagues complete mandatory environmental awareness training. Our accredited Carbon Literacy programme builds understanding of climate change and supports practical action within the leisure, sport and culture sector. By the end of the reporting period, 214 colleagues had been certified as Carbon Literate and 13 colleagues as Water Literate. Our Environmental and Sustainability Ambassadors programme was launched during the year to strengthen local engagement and support delivery across centres. The Sustainability and Environmental Working Group continues to coordinate priorities and share best practices. Our partnership with Windesheim University of Applied Sciences supported further research into green travel, including interventions to encourage more sustainable customer journeys. This work continues through our working group.

Waste Management and Zero Waste to Landfill

Freedom Leisure follows the waste hierarchy, prioritising prevention, reuse and recycling. During the year, we reviewed our national waste management arrangements to improve service consistency, strengthen reporting and support our sustainability priorities. Waste composition analysis is helping identify opportunities to improve segregation, recycling and waste prevention. We also became a Supporter member of the Responsible Plastic Management programme, supporting a more structured approach to reducing unnecessary plastics and improving resource efficiency.

Future Carbon Reduction Initiatives

Our priorities for 2026/27 and the wider strategy period include:

- Continuous rollout of solar PV installation and improving monitoring of renewable generation and use.
- Working with our partners on heating decarbonisation and wider building improvement programmes.
- Developing investment-ready projects for external funding opportunities.
- Improving pool hall ventilation, heating and pumping efficiency through monitoring, controls and operational improvements.
- Delivering and reviewing contract-level environmental action plans.
- Strengthening waste data, composition analysis and recycling performance.
- Developing plastic management and reduction measures.
- Supporting more sustainable colleague and customer travel.
- Embedding practical actions through our Ambassador network and training programme.
- Evaluating emerging technologies through appropriately assessed trials.

Relevant environmental management measures will remain in effect and will be applied when delivering contracts. Site-specific capital measures will be agreed with council partners, taking account of feasibility, funding and asset ownership.

Carbon Reduction Plan (cont.)

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Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 006 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard [1] and uses the appropriate Government emission conversion factors for greenhouse gas company reporting.[2]

Scope 1 and Scope 2 emissions have been reported in accordance with SECR requirements, while required Scope 3 emissions comply with PPN 006 and Corporate Value Chain guidelines.[3]

This Carbon Reduction Plan has been reviewed and signed off by the Senior Leadership Team.

Signed on behalf of Freedom Leisure:

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1 https://ghgprotocol.org/corporate-standard
2 https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting
3 https://ghgprotocol.org/standards/scope-3-standard