

Kirklees Local Area Profile

GAMBLING ACT 2005

1. Introduction and Background

The Licensing Objectives

In exercising most of their functions under the Gambling Act 2005, licensing authorities must have regard to the licensing objectives as set out in section 1 of the Act. The licensing objectives are:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

It should be noted that the Gambling Commission has stated: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".

The council is aware that, as per Section 153, in making decisions about premises licences and temporary use notices it should aim to permit the use of premises for gambling in so far as it thinks it is:

- in accordance with any relevant code of practice issued by the Gambling Commission
- in accordance with any relevant guidance issued by the Gambling Commission
- reasonably consistent with the licensing objectives and
- in accordance with the authority's statement of licensing policy

Local Risk Assessment

It is a requirement of the Gambling Commission's Licence Conditions and Codes of Practice (LCCP), for licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at their premises and have policies, procedures and control measures to mitigate those risks. In making risk assessments, licensees must take into account relevant matters identified in this policy.

In undertaking a local risk assessment the Council will expect the operator, as a minimum to take into account:

- whether the premises is in an area of deprivation
- whether the premises is in an area subject to high levels of crime and/or disorder
- the ethnic profile of residents in the area
- the demographics of the area in relation to vulnerable groups
- the location of services for children such as schools, playgrounds, and other areas where children will gather
- health information and data relating to gambling related harm

The local risk assessment should also show how vulnerable people, including people with gambling dependencies, are protected.

This Local Area Profile has been produced to aid applicants in giving careful consideration to the points above when making an application. The Council recognises that it cannot insist on

applicants using the local area profile when completing their risk assessments. However, an applicant who decides to disregard the profile may face additional representations and the expense of a hearing as a result.

2. Gambling Related Harm

The Local Government Association defines gambling related harm as:

“Any type of repetitive gambling that disrupts or damages personal, family or recreational pursuits. It can have many and varied impact, including on an individual’s physical and mental health, relationships, housing and finances, and affect a wide range of people, such as families, colleagues and wider local communities.”¹

It is with this in mind that Kirklees Council seeks to ensure that gambling premises and license holders are aware of, and committed to ensuring that gambling activity is carefully monitored and that those at risk of gambling related harm are identified and offered appropriate support.

Who is most at risk?

Research and evidence shows that there are a number of population groups who are more at risk of gambling related harm². These are:

- Children, adolescents and young adults (including students)
- People with mental health issues, including those experiencing substance abuse problems
- Individuals from certain minority ethnic groups, such as Asian/Asian British, Black/Black British and Chinese/other ethnicity
- The unemployed
- The homeless
- Those with low intellectual functioning
- Problem gamblers seeking treatment
- People with financially constrained circumstances
- Those living in deprived areas

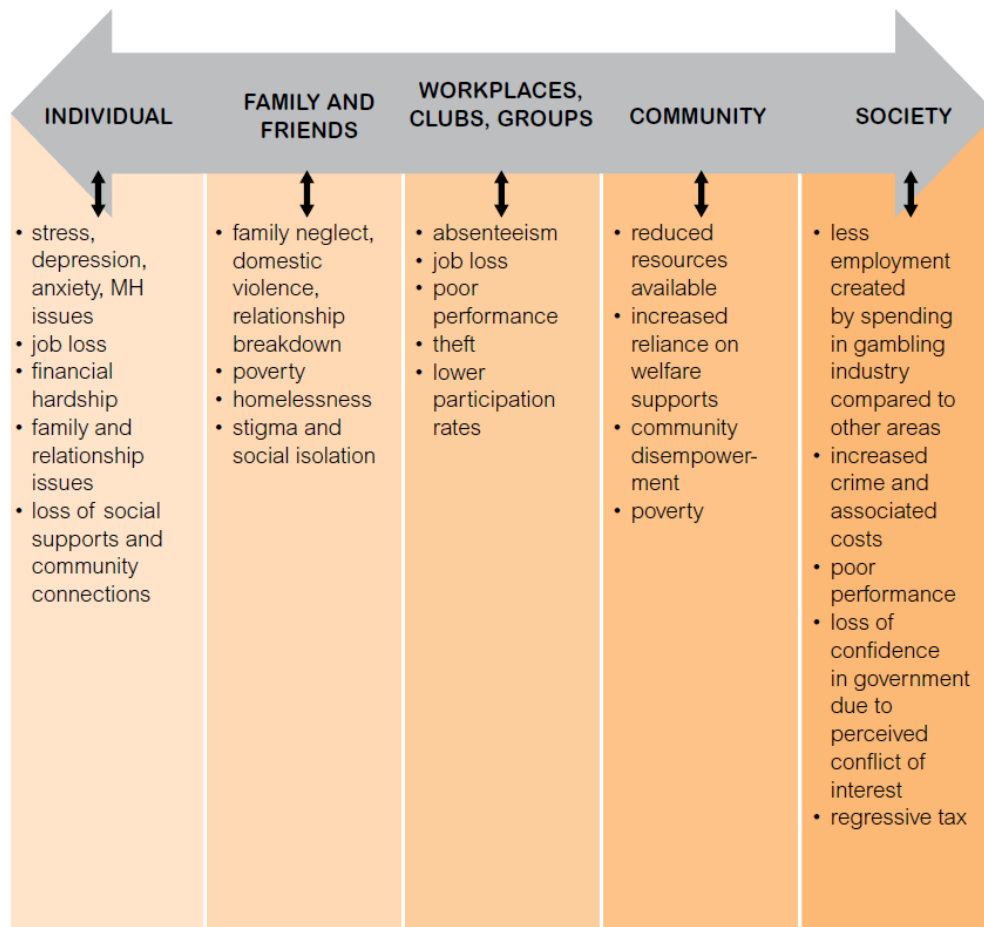
What is the impact?

The impact of gambling can have a significant effect on an individual’s physical, mental and social health. However, the impact can also extend beyond an individual – affecting relationships, families, friends, workplaces and communities. This is demonstrated below³:

¹ Tackling gambling related harm; a whole council approach; Local Government Association and Public Health England; 2018.

² Tackling gambling related harm; a whole council approach; Local Government Association and Public Health England; 2018.

³ Tackling gambling related harm; a whole council approach; Local Government Association and Public Health England; 2018.



Source: Health promotion resource guide for problem gambling prevention in Melbourne North¹²

3. Our Approach to the Local Area Profile

Each locality with Kirklees has its own character and challenges. In order to assist applicants in completing their local risk assessments, the Council has published this Local Area Profile. The local area profile should be given careful consideration when making an application. Applicants may be asked to attend a meeting with licensing officers to discuss the profiles, appropriate measures to mitigate risk in the area and how they might be relevant to their application. The local area profile will be presented to any subsequent licensing sub-committee when they determine an application that has received representations.

The Council recognises that it cannot insist on applicants using the local area profile when completing their risk assessments. However, an applicant who decides to disregard the profile may face additional representations and the expense of a hearing as a result.

3.1 Creating the Kirklees Local Area Profile

A local area profile is an assessment of the key characteristics of Kirklees in the context of gambling-related harm. The information presented helps to provide a better understanding of the types of people that may be more vulnerable to gambling-related harm and where they are located.

We have used spatial analysis to visualise potential vulnerability to gambling-related harm in Kirklees. By mapping certain risk factors associated with gambling related harm we will identify areas of higher risk with regards to vulnerability to gambling-related harm.

Based on the evidence outlined in the section above about which groups may be most at risk of gambling-related harm, the following thematic data was mapped and used to create a 'Gambling Harm Risk Index':

- Deprivation (Index of Multiple Deprivation rankings)
- Unemployment
- Ethnic minorities
- Young people (aged 11-24)
- Crime and ASB rates

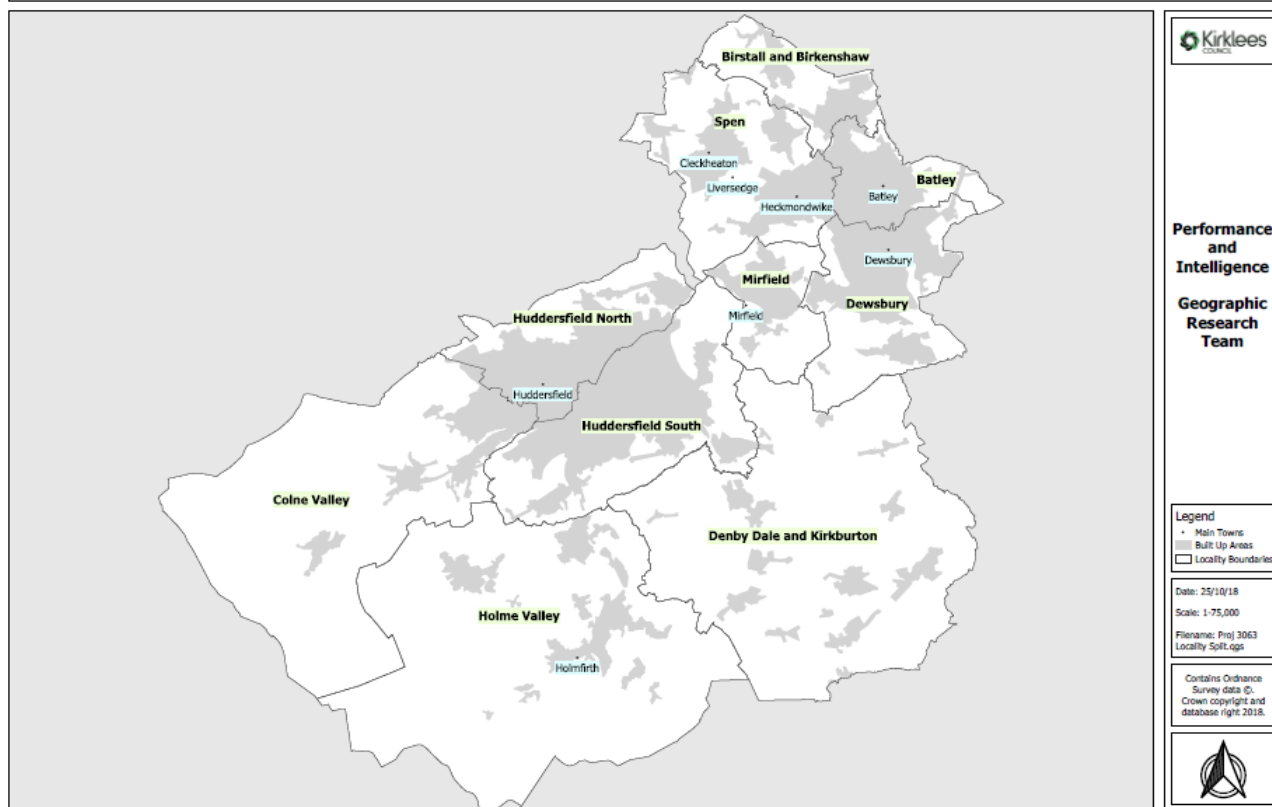
Each LSOA in the District was given score of 1 – 5 for each of the factors, which were then combined to give an overall 'Gambling Harm Risk Score'; the higher the score, the more at risk an area's population may be to gambling-related harm.

To give additional context, the following point data was also mapped:

- Existing gambling establishments
- Educational establishments
- Community centres
- GP surgeries
- Places of worship
- Job centres

In order for the Local Area Profile to be meaningful and easy to use, we divided the District into ten locality areas:

Gambling Local Area Profile - Ten Locality Split



4. The Local Area Profile

4.1 The Kirklees Area

Kirklees Council is situated in West Yorkshire, which contains 5 metropolitan councils in total. The council area has a population of approximately 440,000, making it the largest metropolitan district not based on a city in terms of population. The population has increased by 8.4% since 2002, and is predicted to rise a further 9.9% by 2030. The number of households is expected to increase 20% by 2039. In terms of area it is the third largest in West Yorkshire, covering 157 square miles. The council area is mainly rural in the south with a central urban area around large towns. The area also comprises of several smaller towns of varying sizes. These areas are shown on the map above.

Kirklees has a varied population – many ethnicities are represented, speaking a range of languages and bringing a cultural diversity to the region. A thriving student community based around the University of Huddersfield attracts students from around the world. 21% of the Kirklees population are from an ethnic minority background; significantly higher than the Yorkshire & Humber average of 11% and the national average of 14%. Some parts of Kirklees are much more ethnically diverse than others, with high numbers of ethnic minority groups around Dewsbury, Batley and Huddersfield town centre, but very low numbers in other areas, particularly the South of the district.

Life expectancy and healthy life expectancy (the number of years lived in good health) have been increasing in Kirklees, but there are big inequalities in life expectancy and healthy life expectancy across the District depending on whether someone lives in a more deprived or less deprived area. Kirklees contains areas of high and low deprivation, with regions of highest deprivation found in some of the more densely populated urban areas to the north and east (including parts of Huddersfield, Dewsbury and Batley), and lower levels of deprivation found in the more sparsely populated rural areas to the south and west (including the Colne and Holme Valleys, Denby Dale and Kirkburton). We also know that those living in some of the most deprived areas of the District are more vulnerable to a wide range of health and wellbeing issues, such as smoking, obesity, etc.

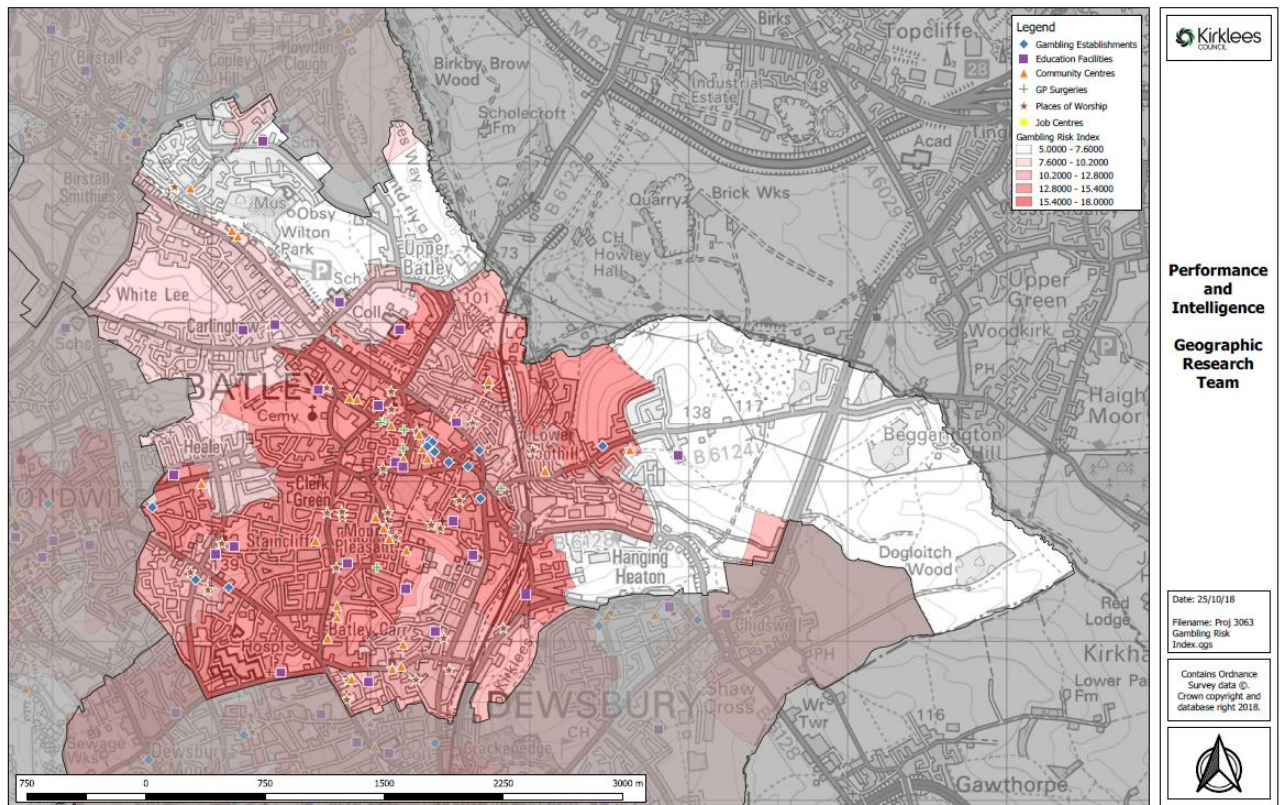
The maps below show the risk levels for gambling harm across the 'ten localities' of Kirklees. Applicants are encouraged to identify the risk level of the area in which they are proposing to make an application and address any local issues around the risk of gambling-related harm. Any areas with a score of 15.4 – 18 are considered very high risk (identifiable by the darkest shade of red) and applications for these areas may be subject to a formal hearing to determine the application, if the licensing authority do not think the operator has considered the risks appropriately. This local area profile is to be considered alongside the other criteria and restrictions set out in the Statement of Principles.

Maps showing the prevalence of each individual risk factor in an area can be found at Appendix 1. Applicants are encouraged to consult these to gain a fuller understanding of the local context and issues in the area in which they are proposing to open an establishment. If required, larger copies of maps are available upon request. Please contact licensing@kirklees.gov.uk

4.2 Batley

There are no areas of Birstall & Birkenshaw identified as very high risk. However, gambling related harm can happen in any area. Applicants proposing to open an establishment here are still encouraged to consider the detailed maps in Appendix 1 and provide details of how they will mitigate for gambling related harm.

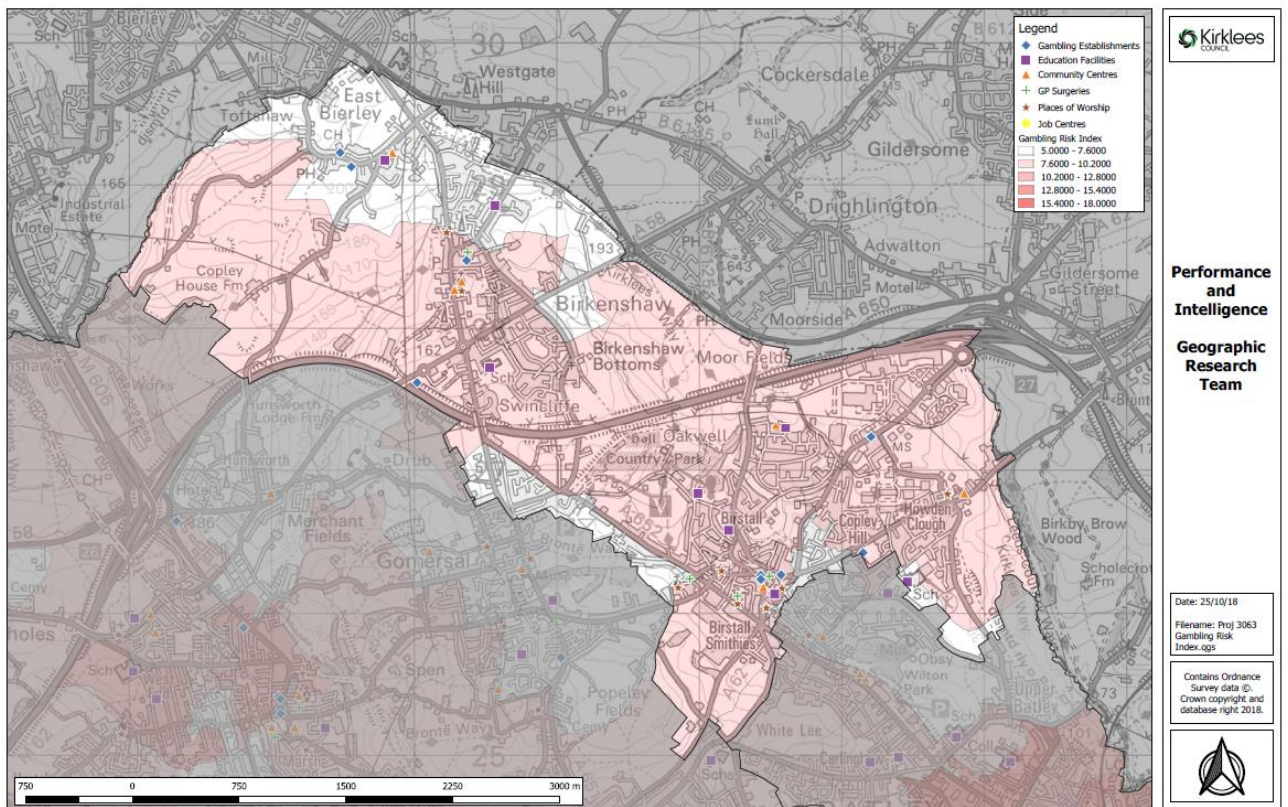
Gambling Local Area Profile – All Risk Factors Combined - Batley



4.3 Birstall & Birkenshaw

There are no areas of Birstall & Birkenshaw identified as very high risk. However, gambling related harm can happen in any area. Applicants proposing to open an establishment here are still encouraged to consider the detailed maps in Appendix 1 and provide details of how they will mitigate for gambling related harm.

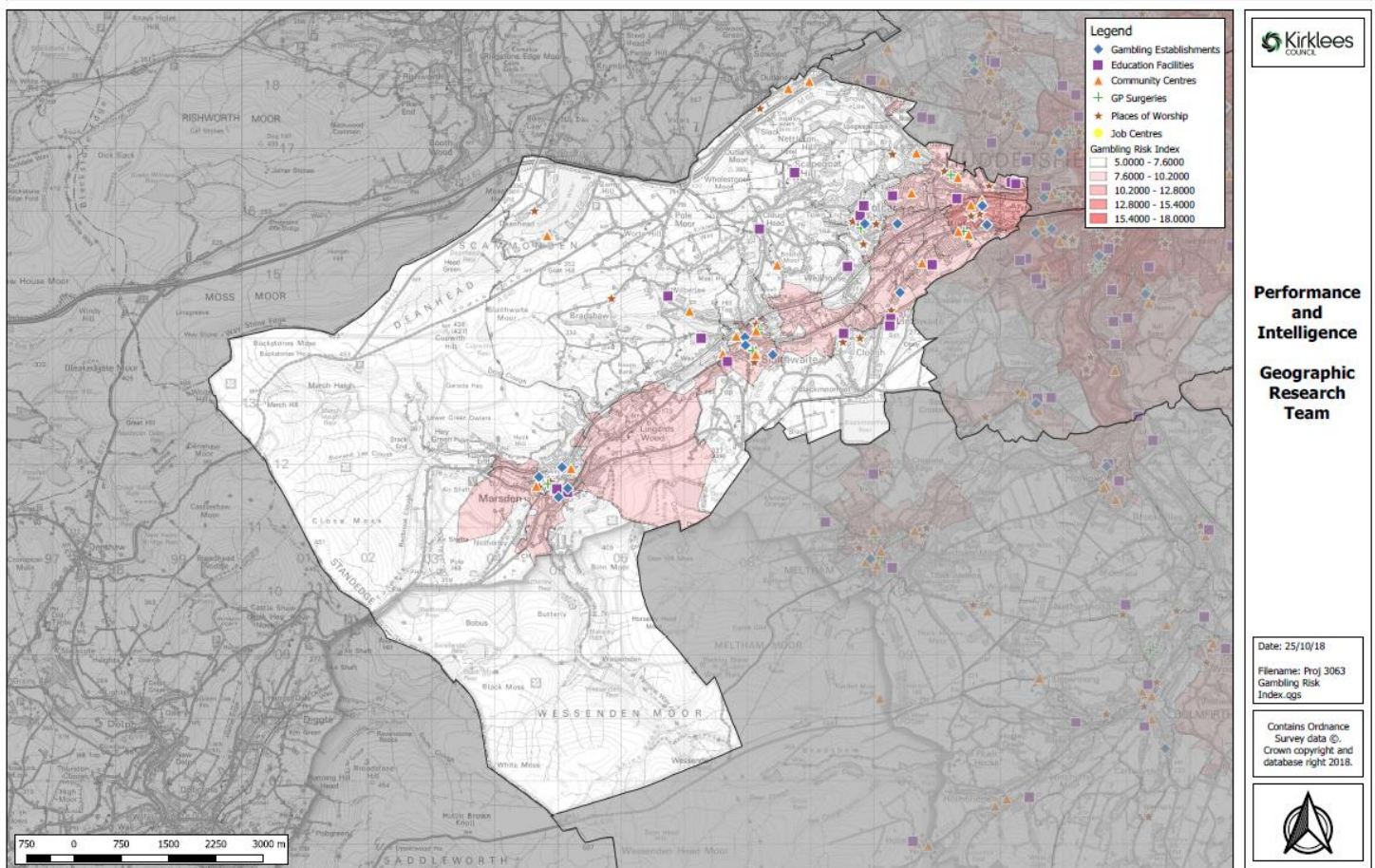
Gambling Local Area Profile – All Risk Factors Combined - Birstall and Birkenshaw



4.4 Colne Valley

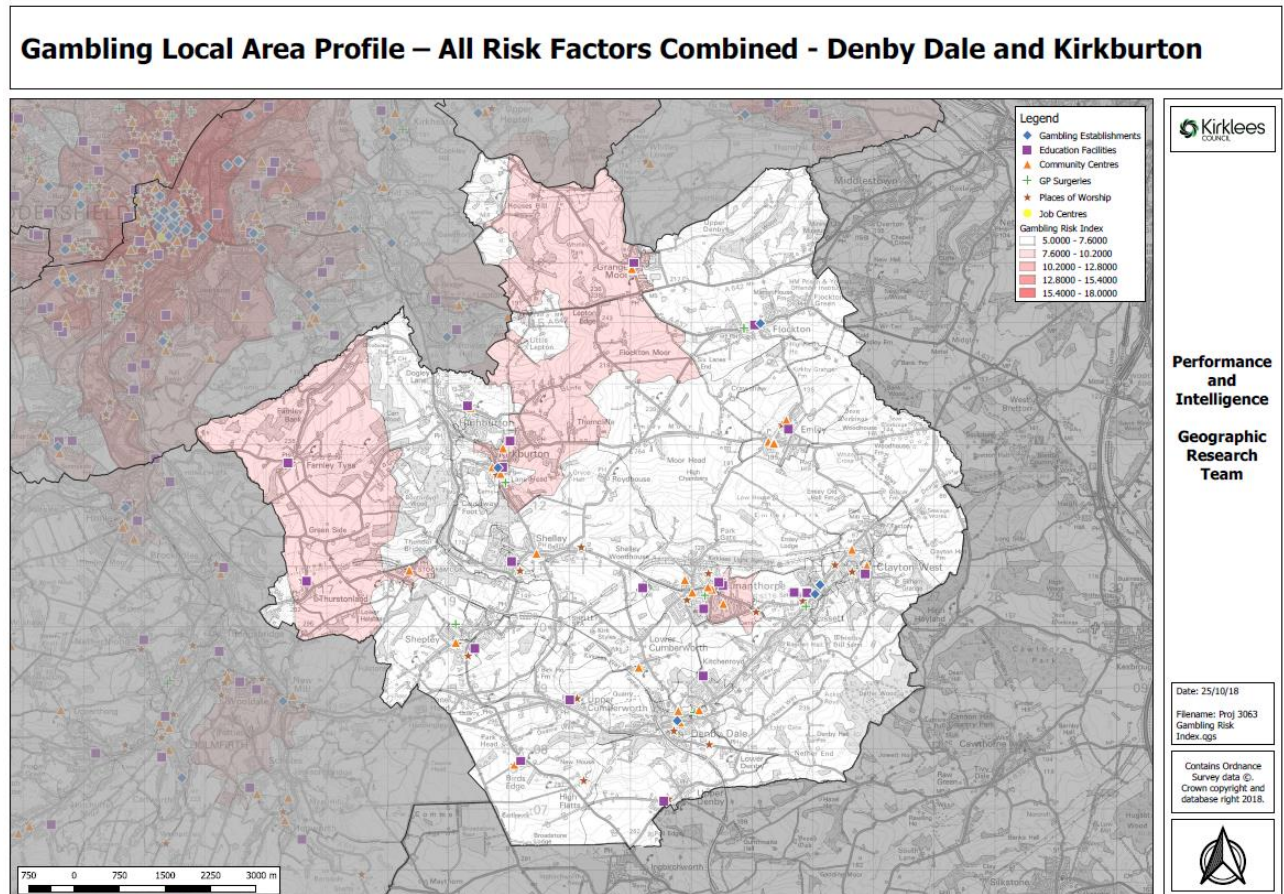
There are no areas of Colne Valley identified as very high risk. However, gambling related harm can happen in any area. Applicants proposing to open an establishment here are still encouraged to consider the detailed maps in Appendix 1 and provide details of how they will mitigate for gambling related harm.

Gambling Local Area Profile – All Risk Factors Combined - Colne Valley



4.5 Denby Dale & Kirkburton

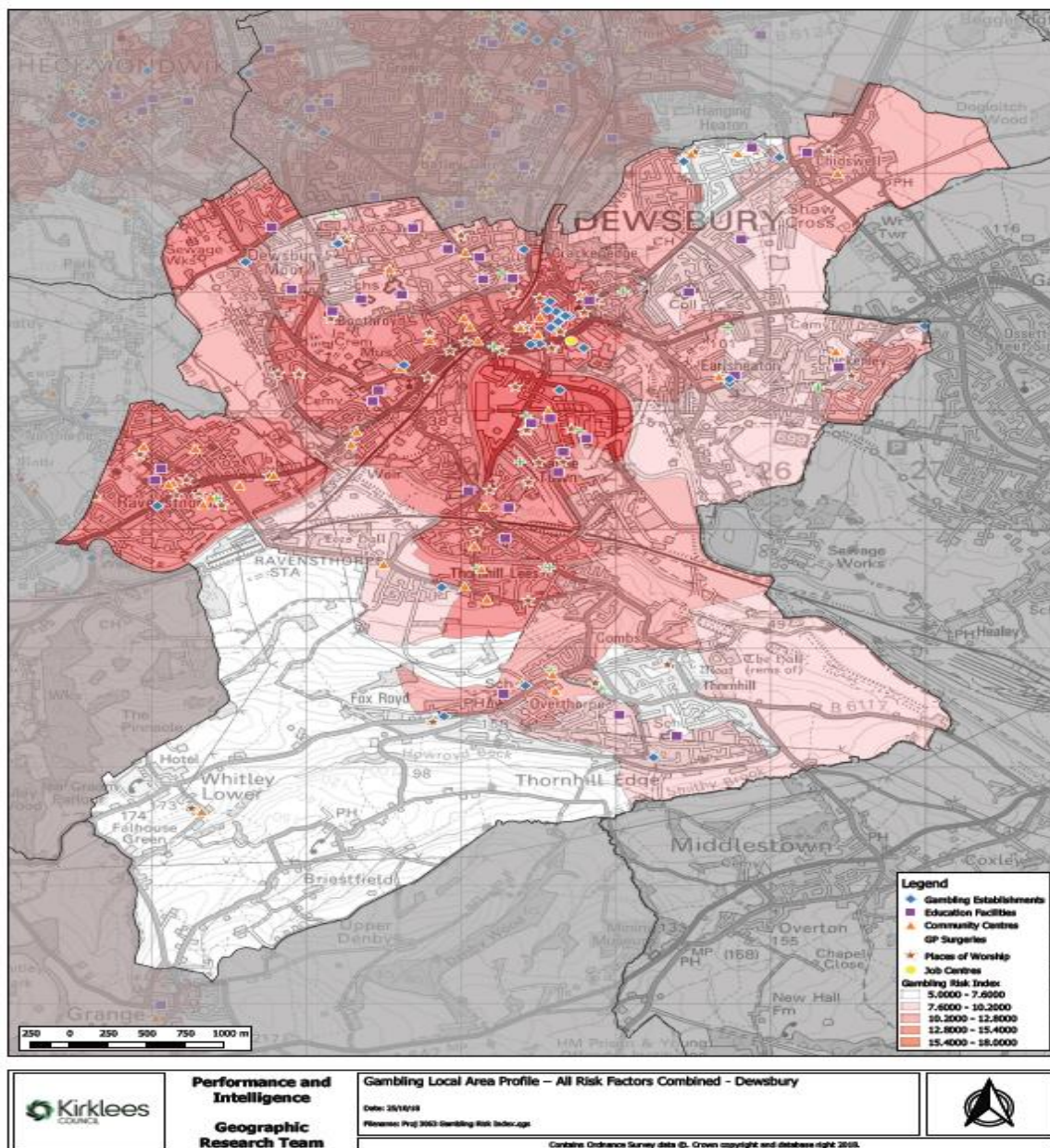
There are no areas of Denby Dale & Kirkburton identified as very high risk. However, gambling related harm can happen in any area. Applicants proposing to open an establishment here are still encouraged to consider the detailed maps in Appendix 1 and provide details of how they will mitigate for gambling related harm.



4.6 Dewsbury

In Dewsbury, there is one LSOA which is considered to be very high risk; this is highlighted in the darkest shade of red below.

Closer scrutiny of applications will take place where they fall within, or near to, the areas highlighted as high risk. Operators applying for licences, or varying licences within these areas, will have to demonstrate, via their local risk assessments, that they have considered the risks identified and have taken the necessary and appropriate steps to mitigate those risks.



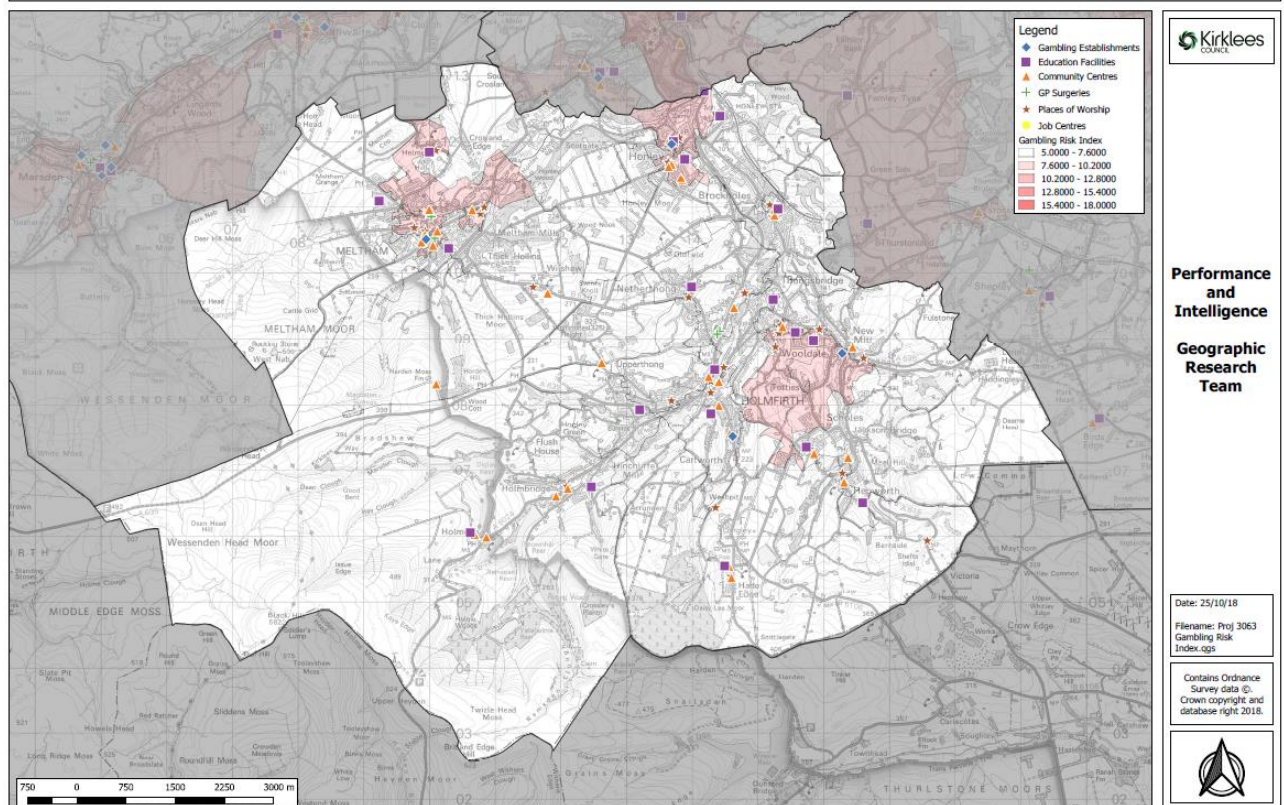
The following postcodes fall within this high risk area:

WF12 9TA	WF12 9AT
WF13 1FF	WF12 9AU
WF12 9AS	WF12 9LT
WF12 9BA	WF12 9PJ
WF12 9JS	WF12 9PN
WF12 9JT	WF12 9PR
WF12 9JU	WF12 9PS
WF12 9JX	WF12 9PT
WF12 9LD	WF12 9PU
WF12 9LE	WF12 9QS
WF12 9LF	WF12 9AQ
WF12 9LG	WF12 9PP
WF12 9LH	WF12 9LN
WF12 9LP	WF12 9AH
WF12 9LR	WF13 1EH
WF12 9LS	WF13 1XH
WF12 9LY	WF12 9AP
WF12 9LZ	WF13 1XL
WF12 9NP	WF12 9AW
WF12 9NS	WF12 9BE
WF12 9LA	WF12 9PW
WF12 9LB	WF12 9AE
WF12 9LW	WF12 9AR
WF12 9BD	WF12 9AN
WF12 9BQ	WF12 9LQ
WF12 9AG	WF12 9AF
	WF12 9LJ
	WF12 9AL
	WF12 9PH
	WF12 9AX

4.7 Holme Valley

There are no areas of Holme Valley identified as very high risk. However, gambling related harm can happen in any area. Applicants proposing to open an establishment here are still encouraged to consider the detailed maps in Appendix 1 and provide details of how they will mitigate for gambling related harm.

Gambling Local Area Profile – All Risk Factors Combined - Holme Valley

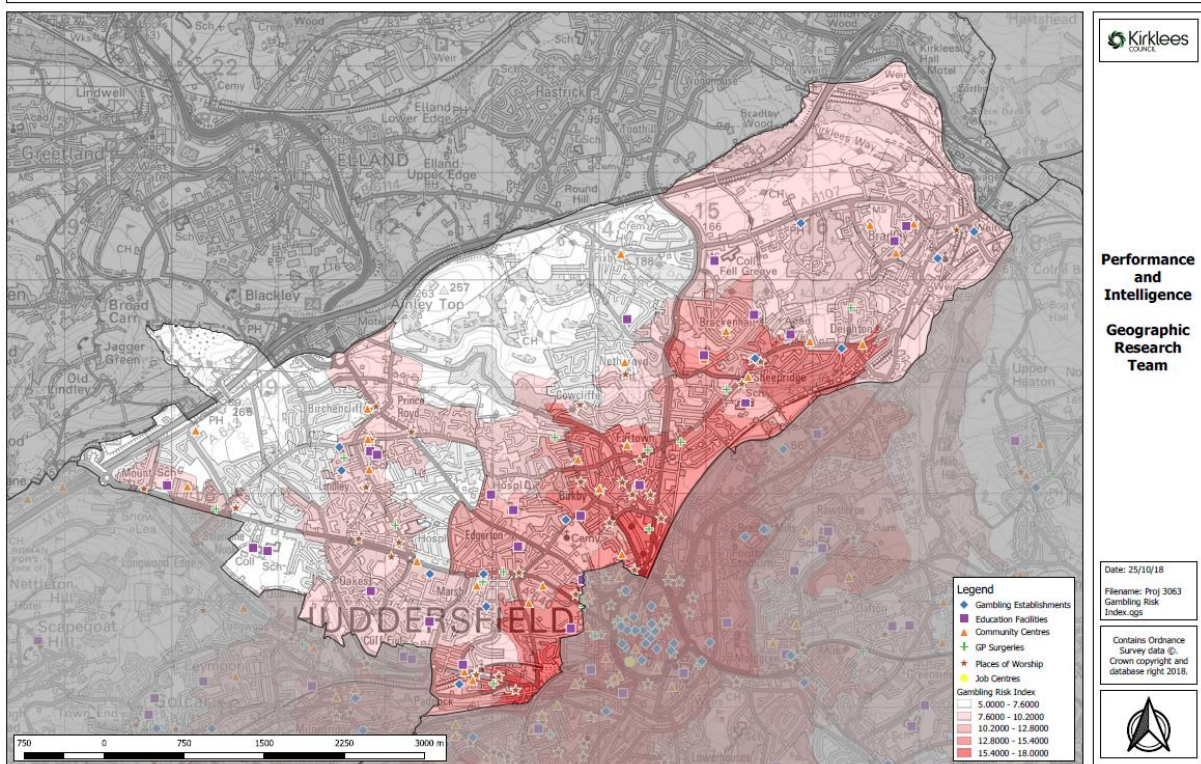


4.8 Huddersfield North and Huddersfield South

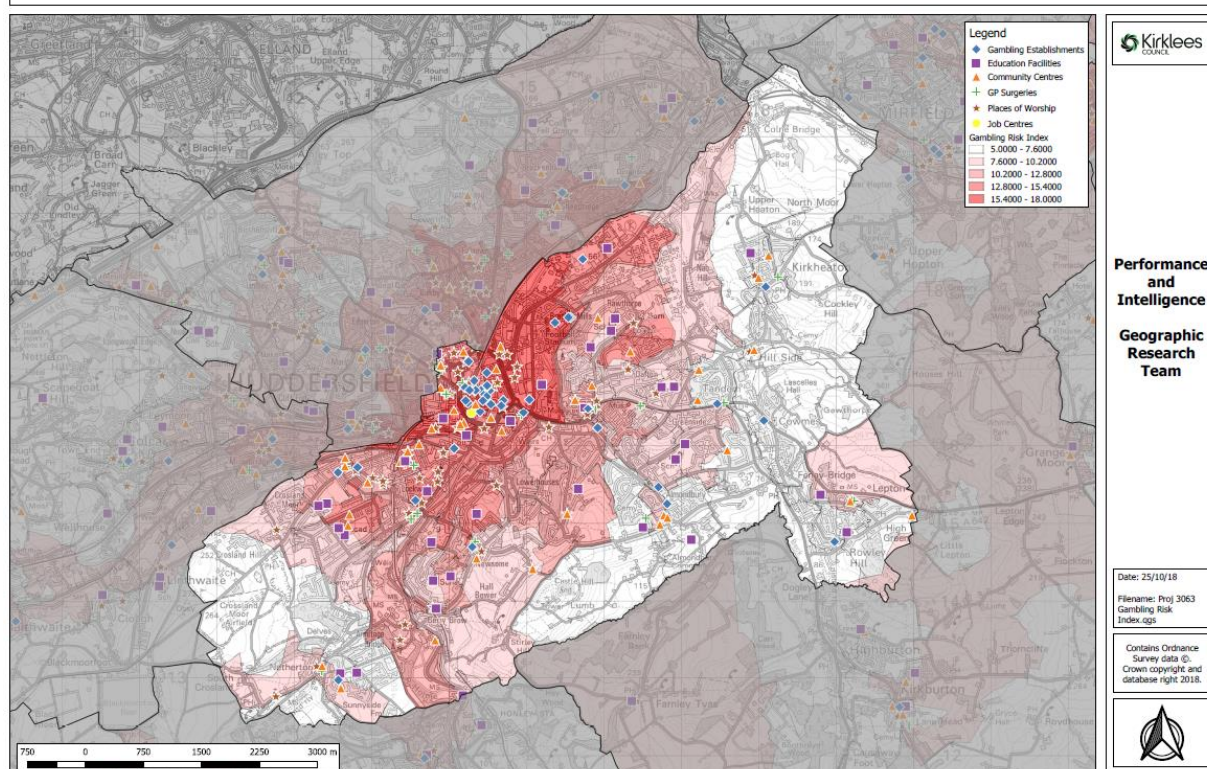
Huddersfield North and Huddersfield South contain two very high risk LSOAs which fall into both area; these are highlighted in the darkest shade of red on the maps below

Closer scrutiny of applications will take place where they fall within, or near to, the areas highlighted as high risk. Operators applying for licences, or varying licences within these areas, will have to demonstrate, via their local risk assessments, that they have considered the risks identified and have taken the necessary and appropriate steps to mitigate those risks.

Gambling Local Area Profile – All Risk Factors Combined - Huddersfield North



Gambling Local Area Profile – All Risk Factors Combined - Huddersfield South



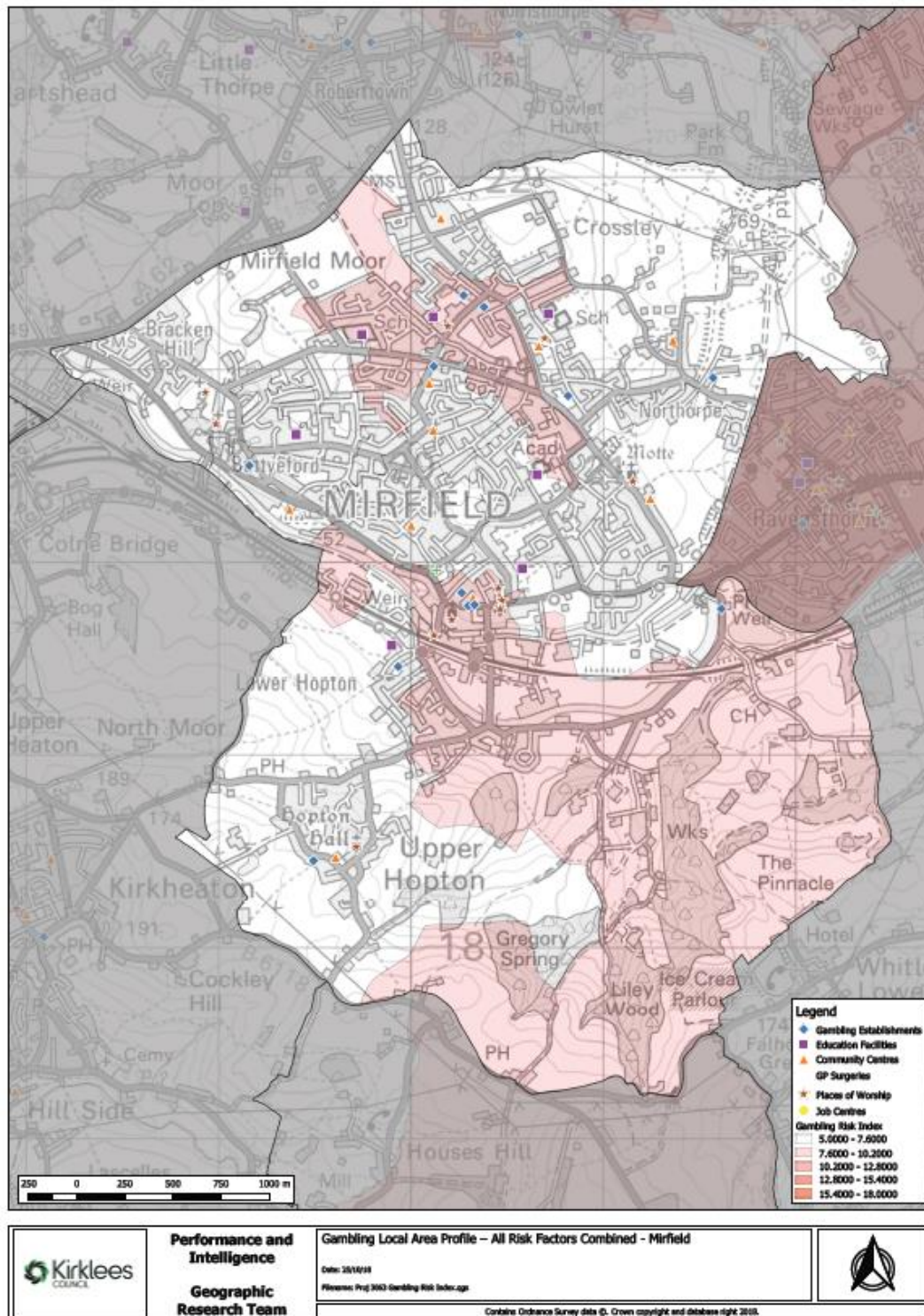
The following postcodes fall within these high risk areas:

HD1 2AN	HD1 1DT	HD1 2PU	HD1 2DT	HD1 2QE	HD1 5DG	HD1 6JH
HD1 2PT	HD1 1ER	HD1 2SU	HD1 2EF	HD1 6AH	HD1 5AW	HD1 6JJ
HD1 1DR	HD1 1DD	HD1 2TH	HD1 2BP	HD1 6QT	HD1 5AT	HD1 6JL
HD1 1DY	HD1 1DL	HD1 2UR	HD1 2EP	HD1 6QX	HD1 5DL	HD1 6JN
HD1 1QA	HD1 1QF	HD1 2BW	HD1 2JD	HD1 6HQ	HD1 5DQ	HD1 6JW
HD1 1BQ	HD1 1BA	HD1 2EH	HD1 2LR	HD1 6QS	HD1 6AL	HD1 6NJ
HD1 1DU	HD1 1BT	HD1 2JY	HD1 2QD	HD1 6QR	HD1 6BR	HD1 6NN
HD1 2EX	HD1 1BX	HD1 2PZ	HD1 2QJ	HD1 1QT	HD1 6HU	HD1 6NW
HD1 1SG	HD1 1EG	HD1 2QA	HD1 2JF	HD1 2DN	HD1 6NG	HD1 6PU
HD1 1QX	HD1 1EH	HD1 2QF	HD1 2AA	HD1 1QS	HD1 6BA	HD1 6AY
HD1 1BY	HD1 1RL	HD1 2RA	HD1 2AX	HD1 1DG	HD1 6BG	HD1 6BE
HD1 1NP	HD1 1BU	HD1 2SQ	HD1 2AZ	HD1 4AD	HD1 6BW	HD1 6JP
HD1 1NY	HD1 2AD	HD1 2DX	HD1 2BU	HD1 2QT	HD1 6BL	HD1 6BY
HD1 1PB	HD1 2AL	HD1 2EG	HD1 2SX	HD1 1QY	HD1 6HY	HD1 6AP
HD1 1QH	HD1 2AR	HD1 2JJ	HD1 2BR	HD1 1AA	HD1 6JB	HD1 6BN
HD1 1QJ	HD1 2BQ	HD1 2PY	HD1 2HG	HD1 6AJ	HD1 6JE	HD1 6DD
HD1 1QQ	HD1 2BT	HD1 2RD	HD1 2HE	HD1 1ED	HD1 6JF	HD1 6AR
HD1 1QZ	HD1 2EA	HD1 2RS	HD1 2BB	HD1 1RW	HD1 6DZ	HD1 6NB
HD1 1RA	HD1 2EW	HD1 2RT	HD1 2HA	HD1 1RY	HD1 6HZ	HD1 6AE
HD1 1ES	HD1 2LE	HD1 2ET	HD1 2HL	HD1 1EB	HD1 6JA	HD1 5AA
HD1 1BG	HD1 2LF	HD1 2SP	HD1 2RX	HD1 6AS	HD1 6JG	HD1 6BZ

HD5 9AD	HD1 6PP	HD1 6PX	HD1 2NX	HD1 4BP
HD5 9AN	HD1 6PW	HD2 1YG	HD1 3HR	HD1 4BZ
HD1 6RA	HD1 6PH	HD1 6AQ	HD1 3HU	HD1 4HA
HD1 6SB	HD1 6PR	HD1 1RF	HD1 3HY	HD1 4RN
HD1 6RX	HD1 6PT	HD1 6AF	HD1 3HZ	HD1 4RU
HD1 6SD	HD1 6RJ	HD1 2DR	HD1 3JB	HD1 4RY
HD5 9BA	HD1 6PS	HD1 2HF	HD1 3LE	HD1 4SE
HD5 9AB	HD1 6PF	HD1 6QB	HD1 3LF	HD1 2NS
HD5 9AE	HD2 1YB	HD1 1QL	HD1 4SF	HD1 3EB
HD1 6RZ	HD1 6PD	HD1 1DJ	HD1 4AZ	HD1 2JL
HD5 9BS	HD2 1YD	HD1 6AX	HD1 4BB	HD1 2JT
HD5 9AF	HD2 1YF	HD1 6BX	HD1 4BD	HD1 3HJ
HD1 6NA	HD1 6DE	HD5 9AA	HD1 4BE	HD1 3HW
HD1 6PG	HD1 2QR	HD1 1DE	HD1 4BG	HD1 4BA
HD1 6PE	HD1 2QB	HD1 1LE	HD1 4BL	HD1 4DL
HD1 6NS	HD1 6ND	HD1 1SW	HD1 4BN	HD1 4BU
HD1 6NX	HD1 2ES	HD1 1TA	HD1 4EU	HD1 4AJ
HD1 6NY	HD1 5AN	HD1 2DW	HD1 4RP	HD1 4AN
HD1 6NZ	HD5 9AL	HD1 2SN	HD1 4RT	HD1 4SR
HD1 6PA	HD1 2QY	HD1 6NL	HD1 4RX	HD1 4BX
HD1 6PB	HD1 6QE	HD1 6PZ	HD1 4RZ	HD1 2JN
HD1 6PJ	HD1 2BN	HD1 6SE	HD1 4SG	HD1 3JD
HD1 6PL	HD1 6NE	HD1 2RB	HD1 4SH	HD1 2JS
HD1 6PN	HD1 6BT	HD1 1DA	HD1 4SJ	HD1 2TG
HD1 6BB	HD1 1RD	HD1 1ST	HD1 4SS	HD1 3LD
HD1 1RX	HD1 6DG	HD1 1SU	HD4 5AE	HD1 3FH
HD1 6NT	HD1 6NU	HD1 9JT	HD1 3JA	HD1 3FJ
HD1 1SR	HD1 2ER	HD4 5AA	HD1 4SD	HD1 3FL
HD1 6AG	HD1 1DH	HD4 5AD	HD1 1SE	HD1 2NU
				HD1 4RL
				HD1 2JA
				HD1 4BS

4.9 Mirfield

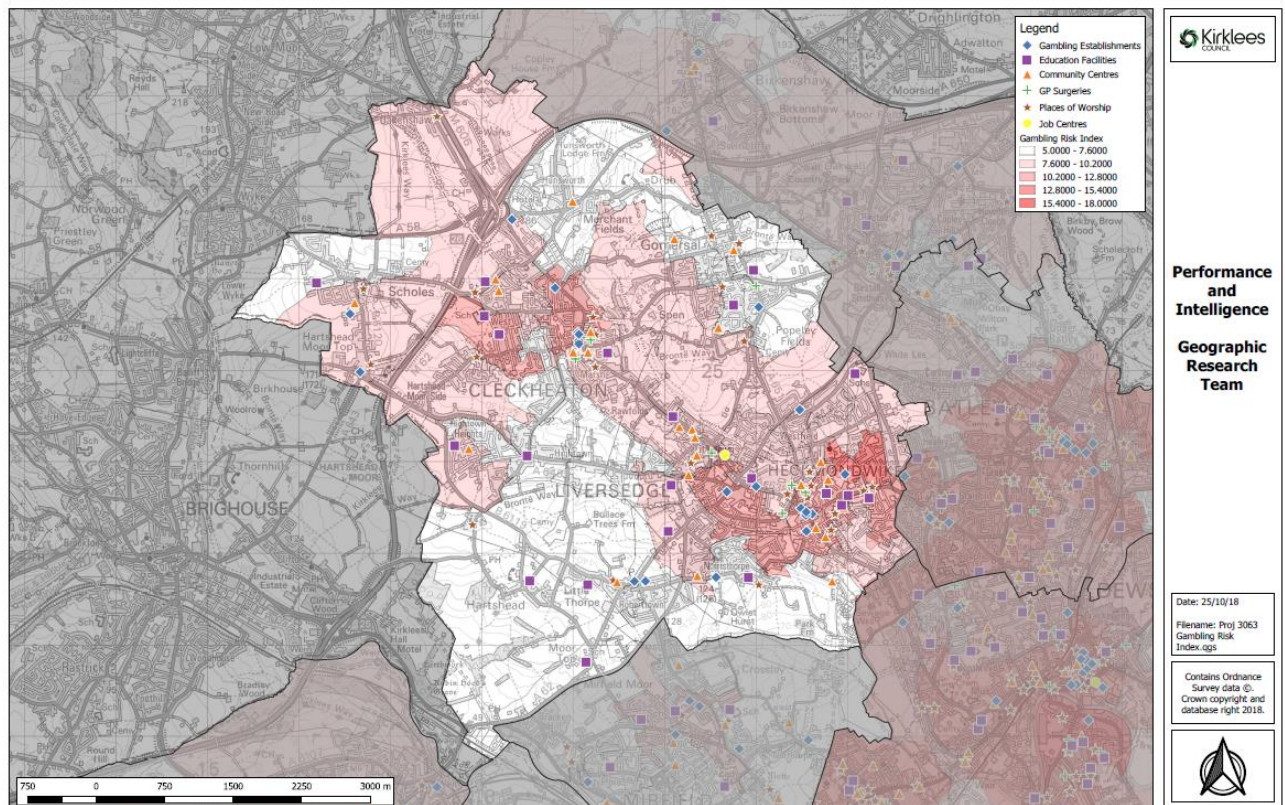
There are no areas of Mirfield identified as very high risk. However, gambling related harm can happen in any area. Applicants proposing to open an establishment here are still encouraged to consider the detailed maps in Appendix 1 and provide details of how they will mitigate for gambling related harm.



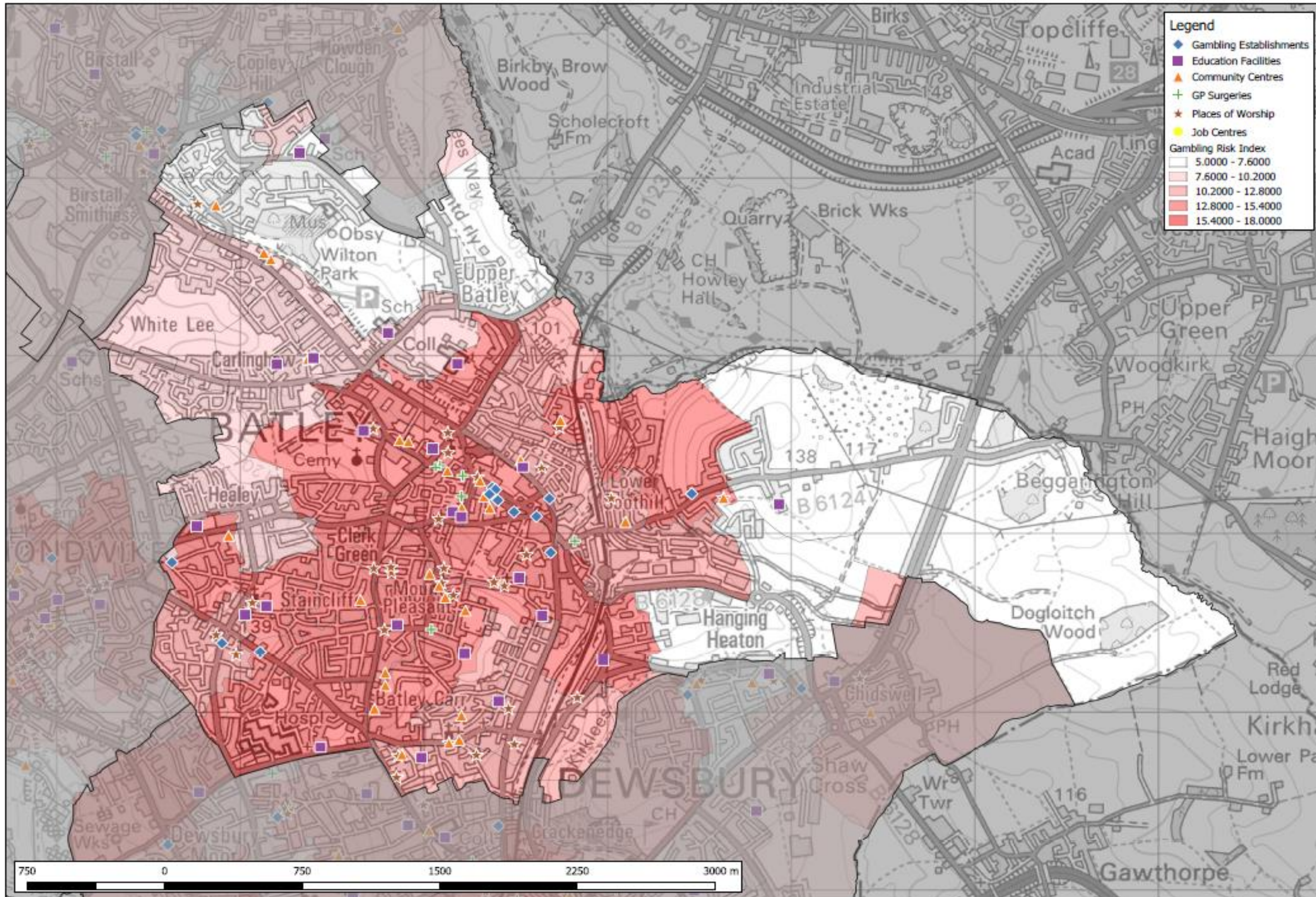
4.10 Spen

There are no areas of Spen considered to be very high risk. However, gambling related harm can happen in any area. Applicants proposing to open an establishment here are still encouraged to consider the detailed maps in Appendix 1 and provide details of how they will mitigate for gambling related harm.

Gambling Local Area Profile – All Risk Factors Combined - Spen



Gambling Local Area Profile – All Risk Factors Combined - Batley



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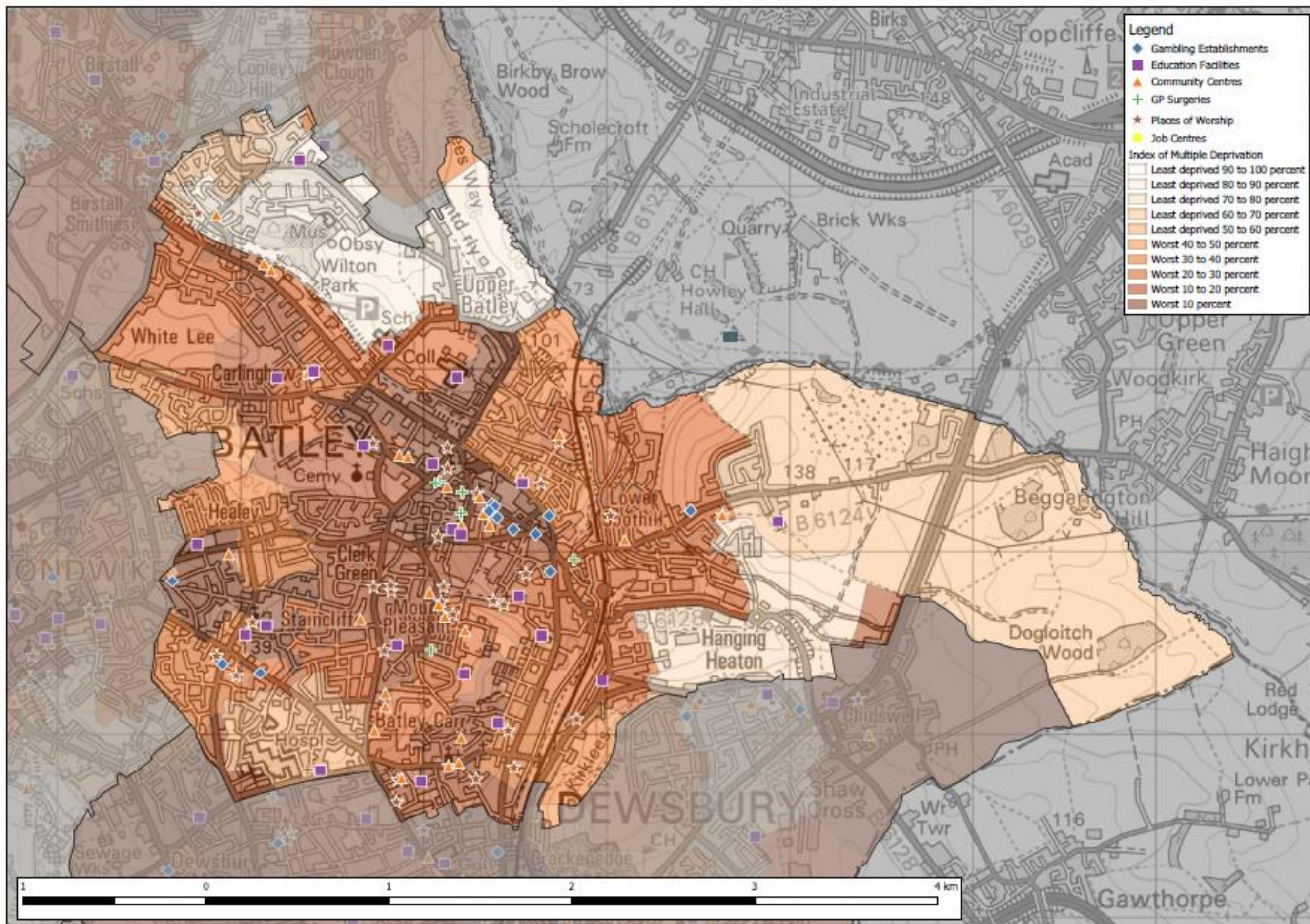
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Gambling Risk
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Batley



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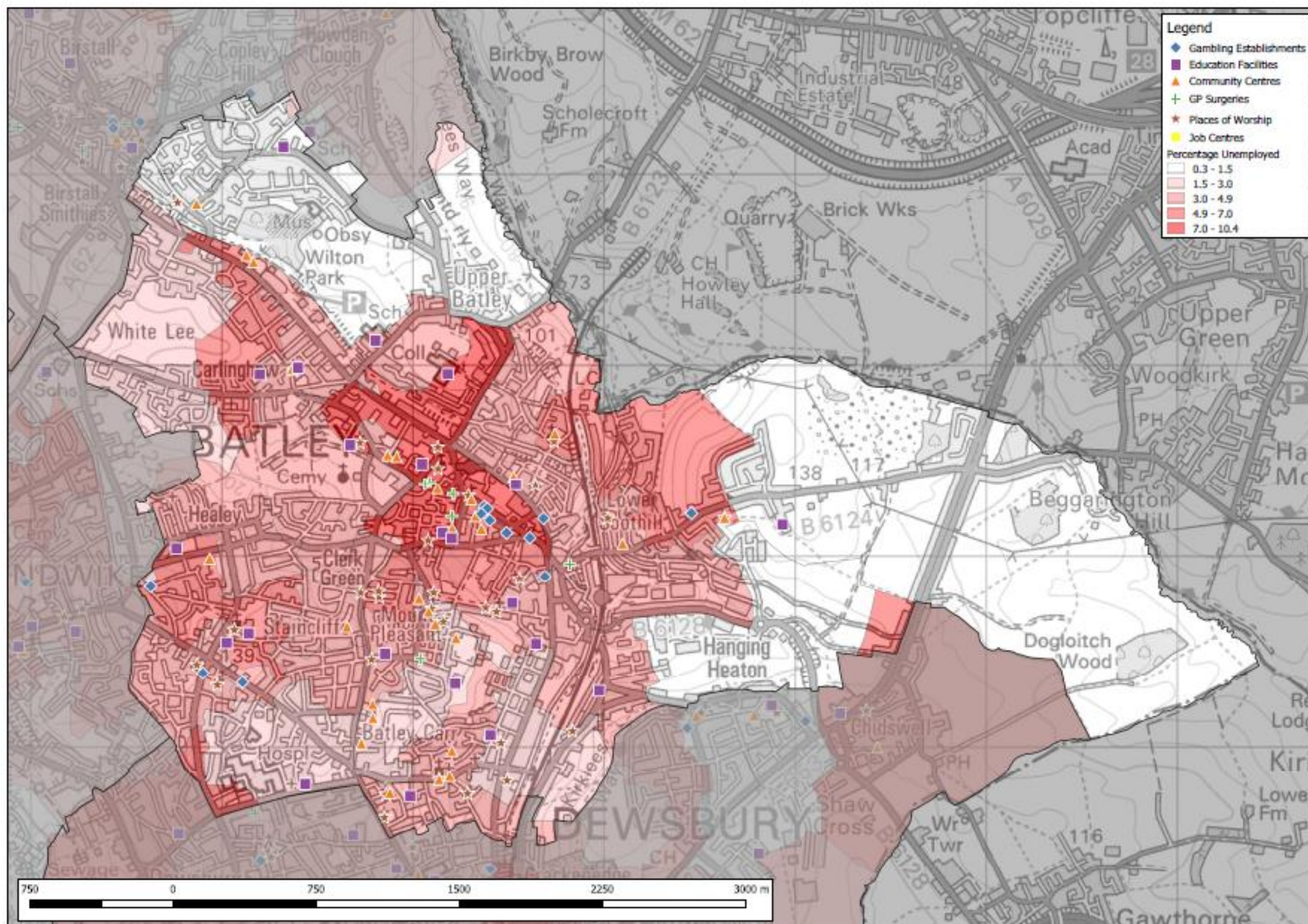
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Deprivation Maps.qgs

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Gambling Local Area Profile - Percentage Unemployment - Batley



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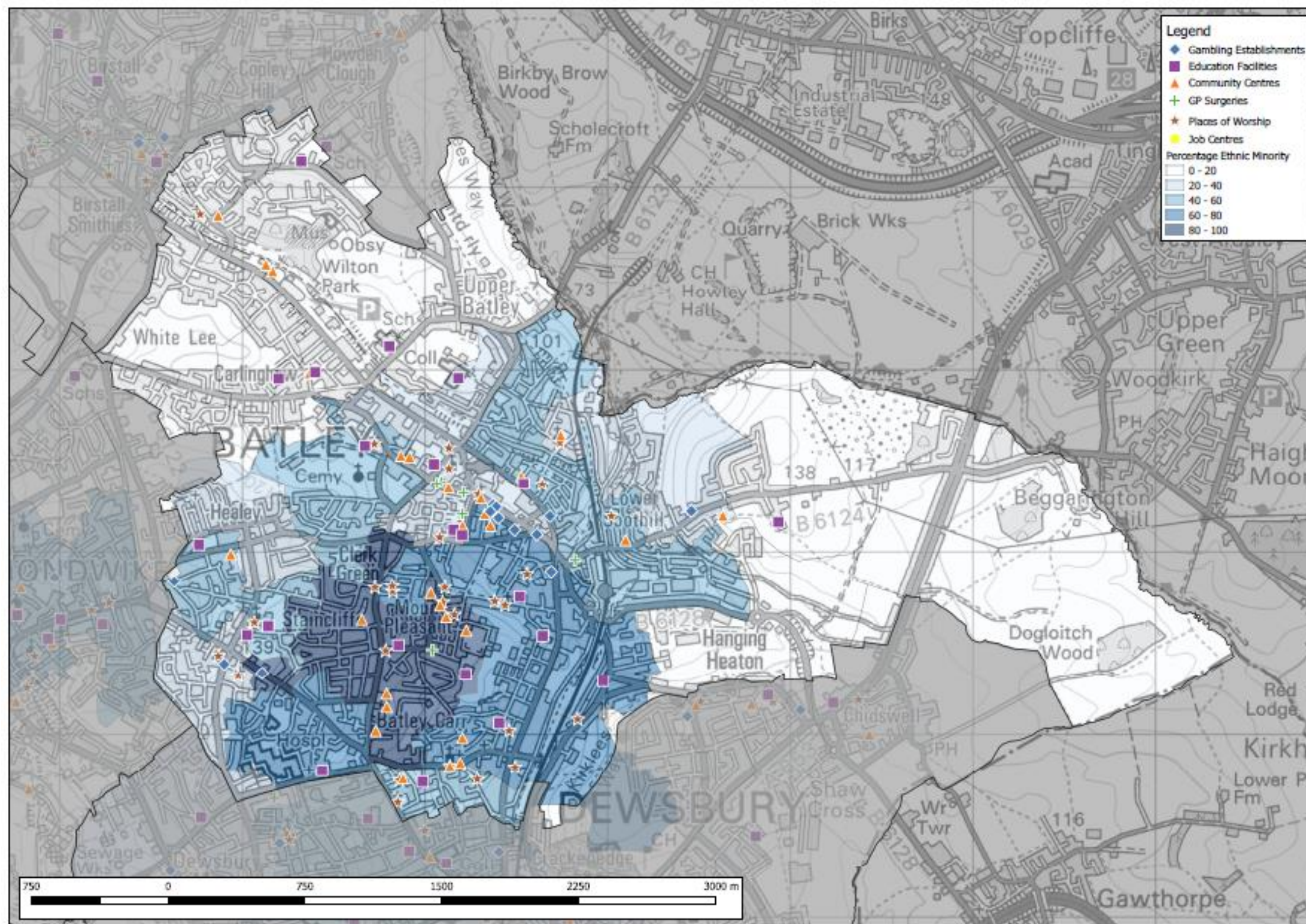
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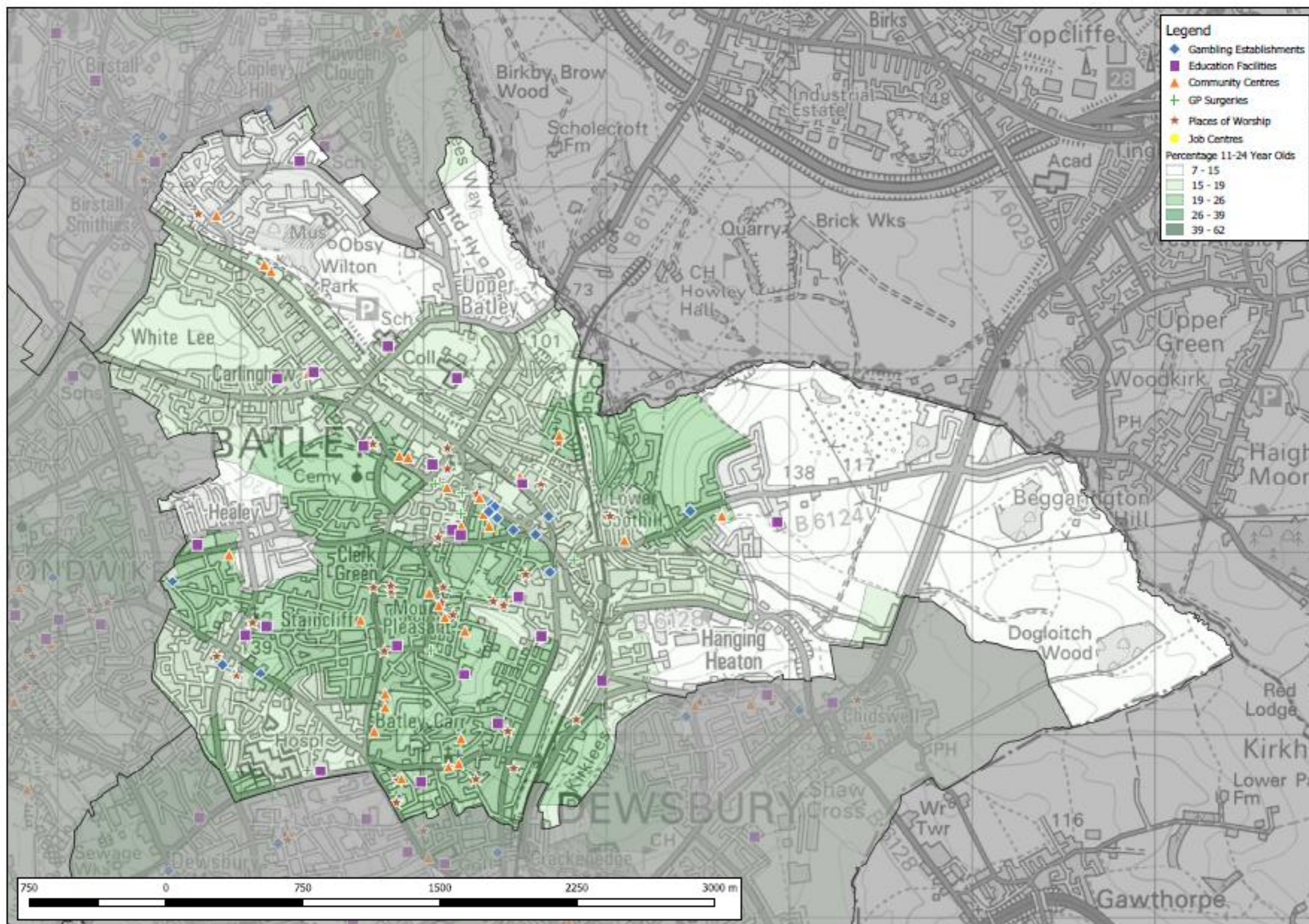
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Gambling Local Area Profile - Percentage Ethnic Minorities - Batley



Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Batley



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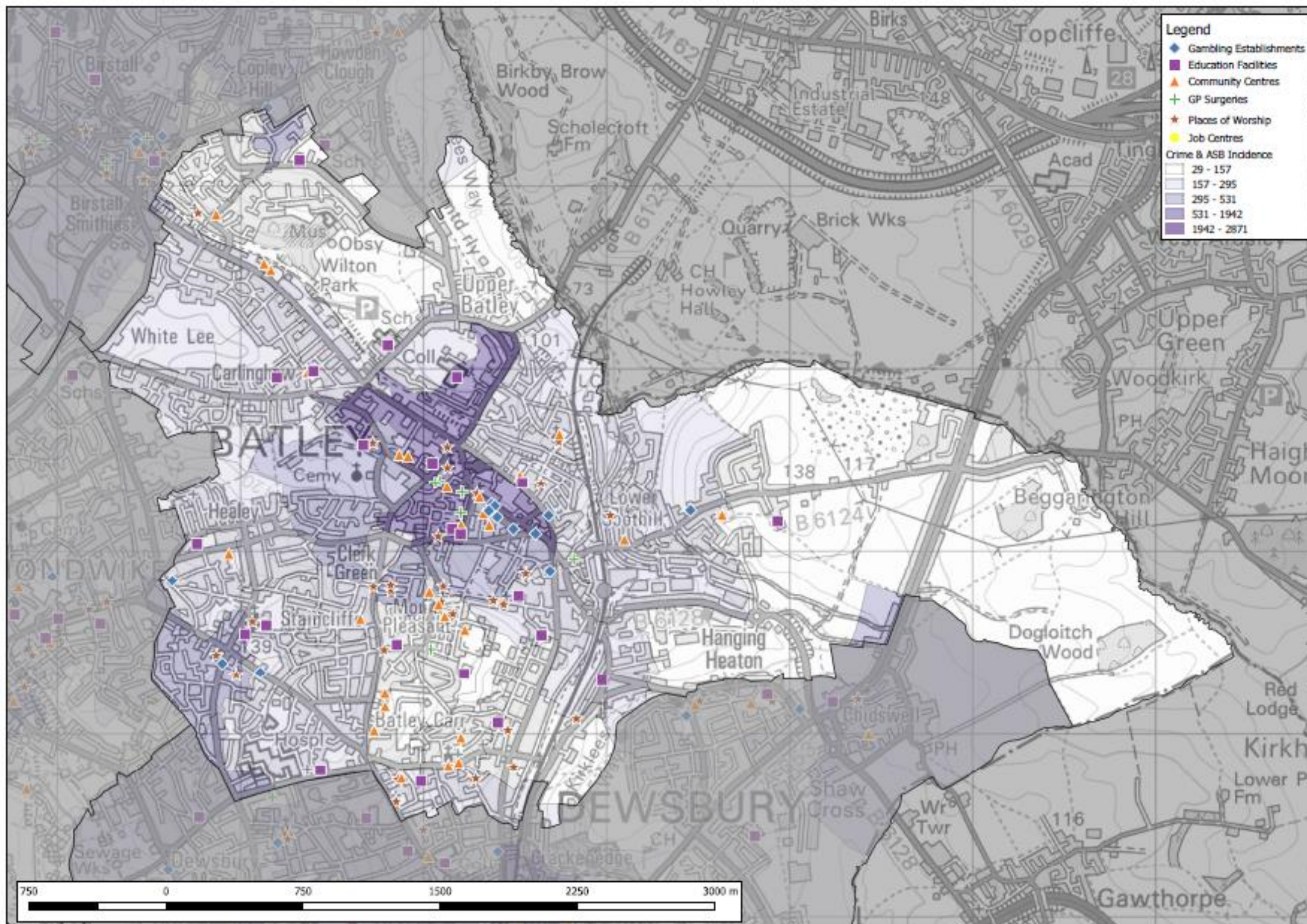
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Young People
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Batley



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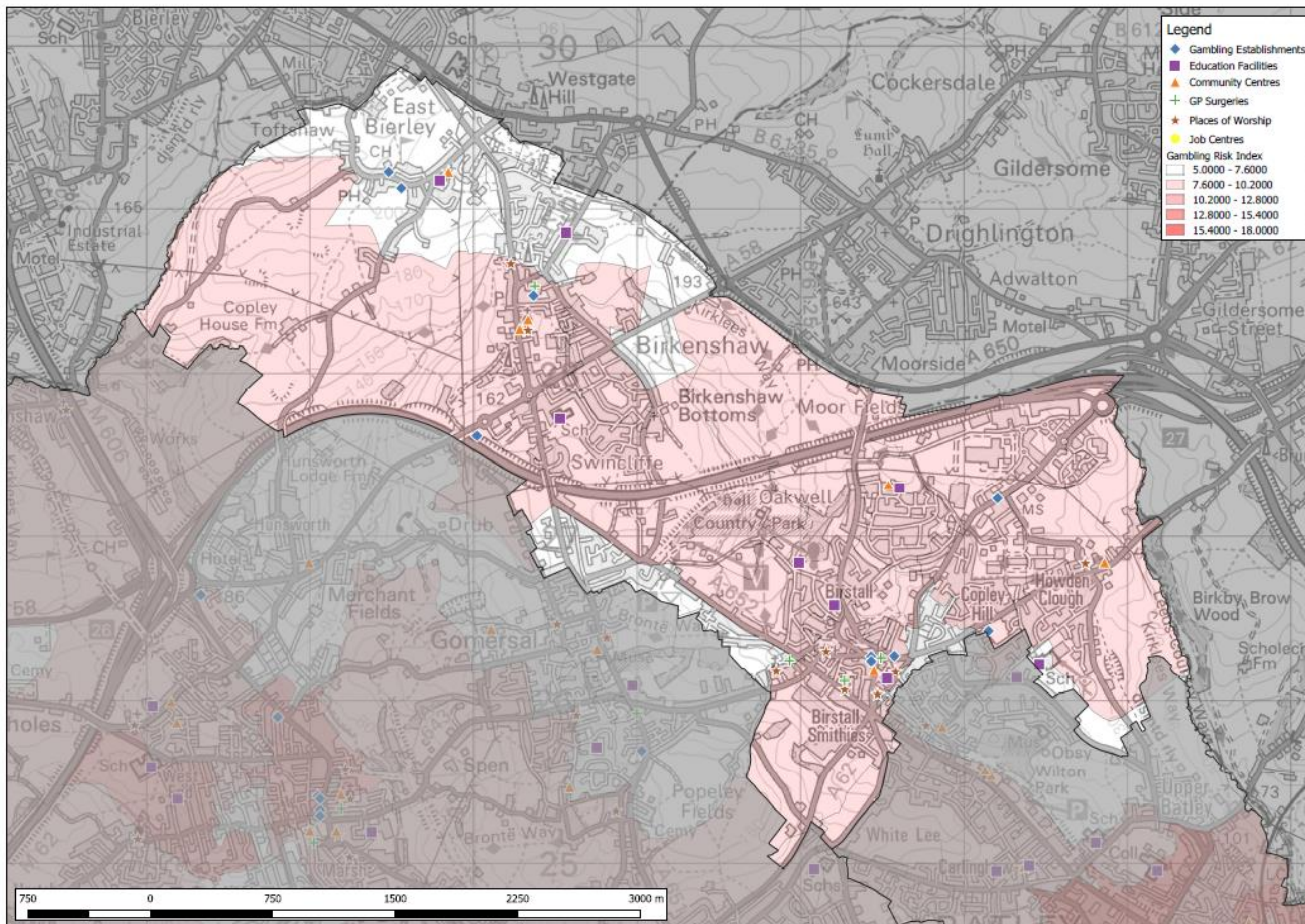
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Gambling Local Area Profile – All Risk Factors Combined - Birstall and Birkenshaw



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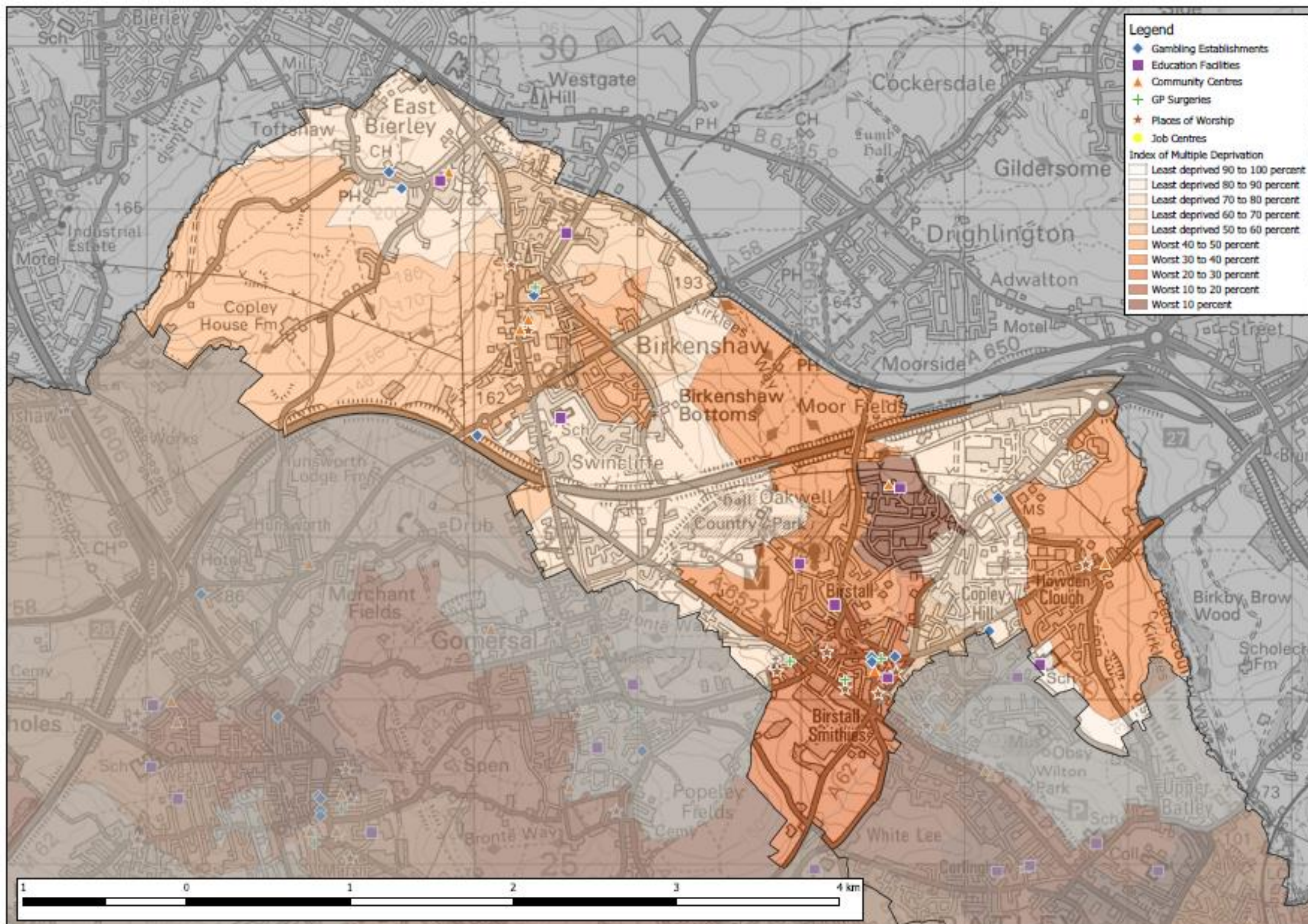
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Birstall and Birkenshaw



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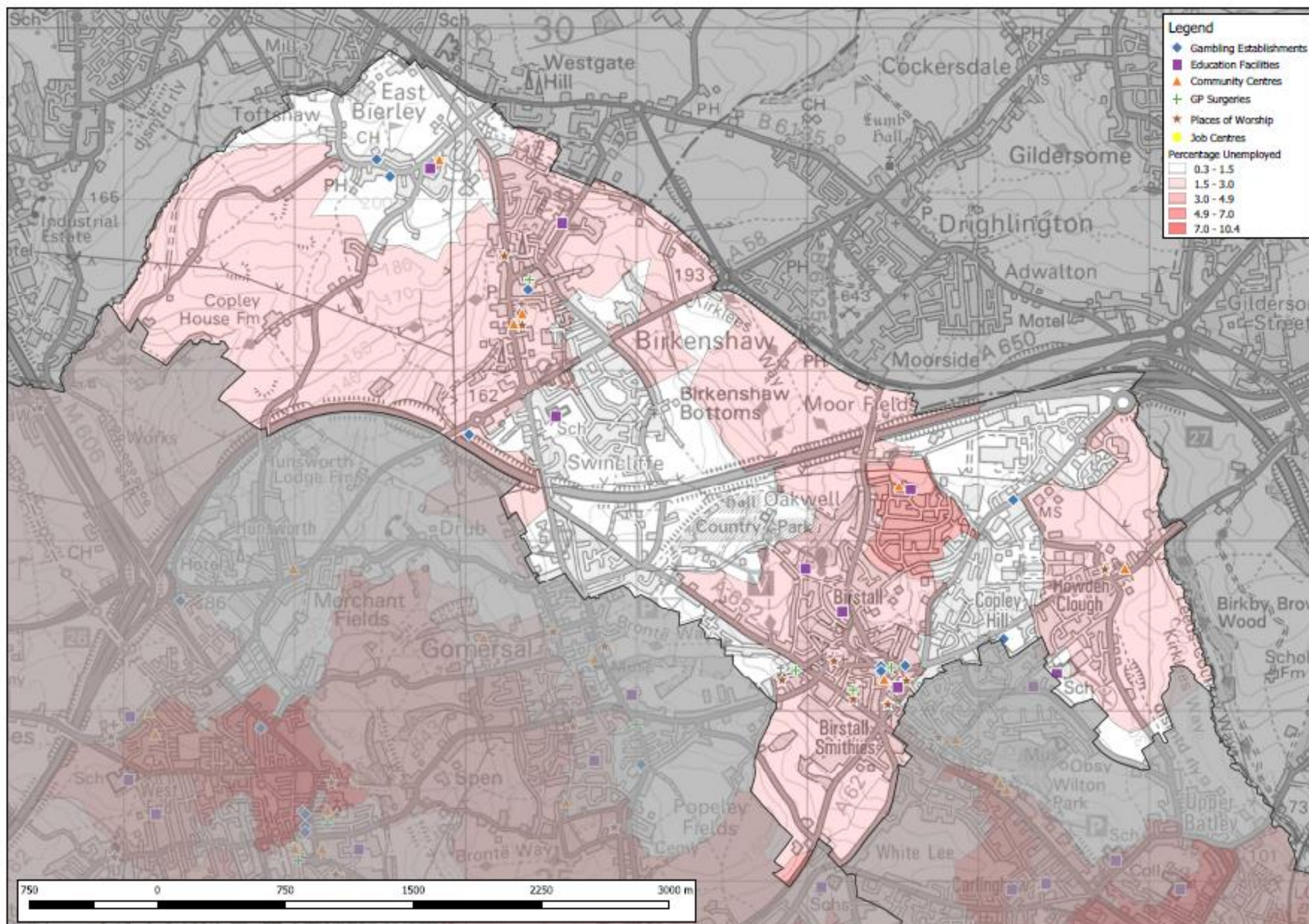
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Deprivation Maps.qgs

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Gambling Local Area Profile - Percentage Unemployment - Birstall and Birkenshaw



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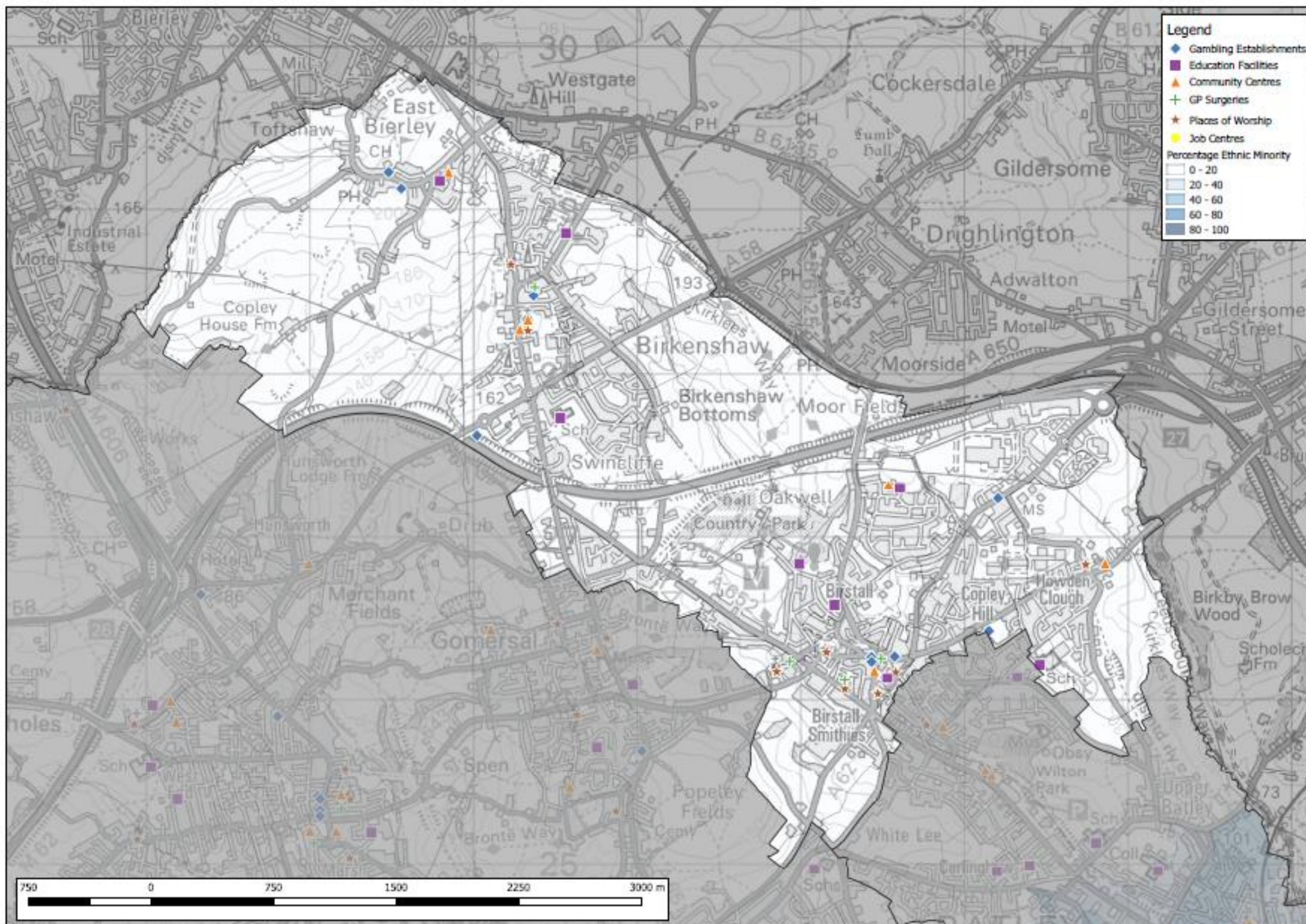
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Gambling Local Area Profile - Percentage Ethnic Minorities - Birstall and Birkenshaw



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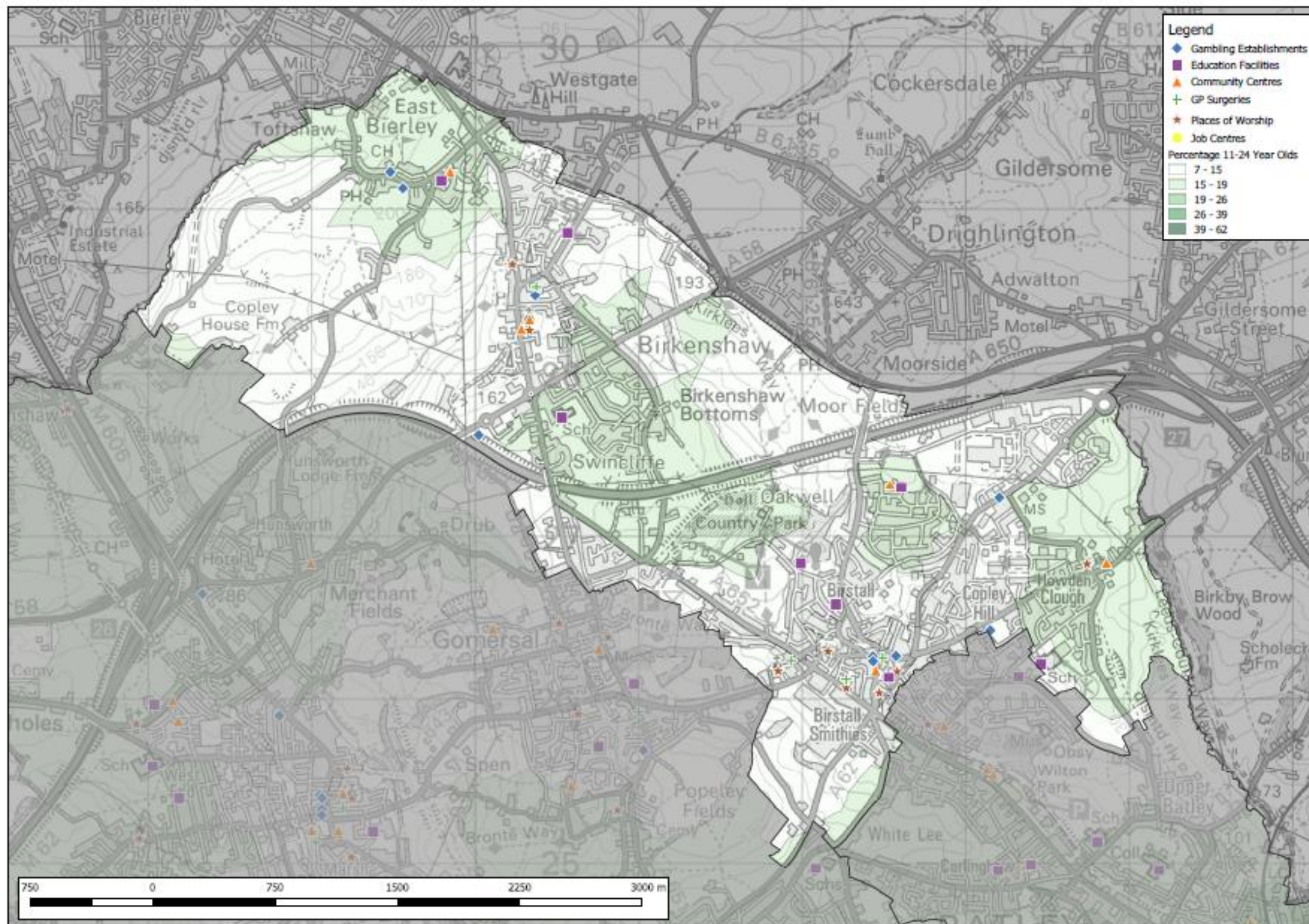
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Ethnicity Maps.qgs

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Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Birstall and Birkenshaw



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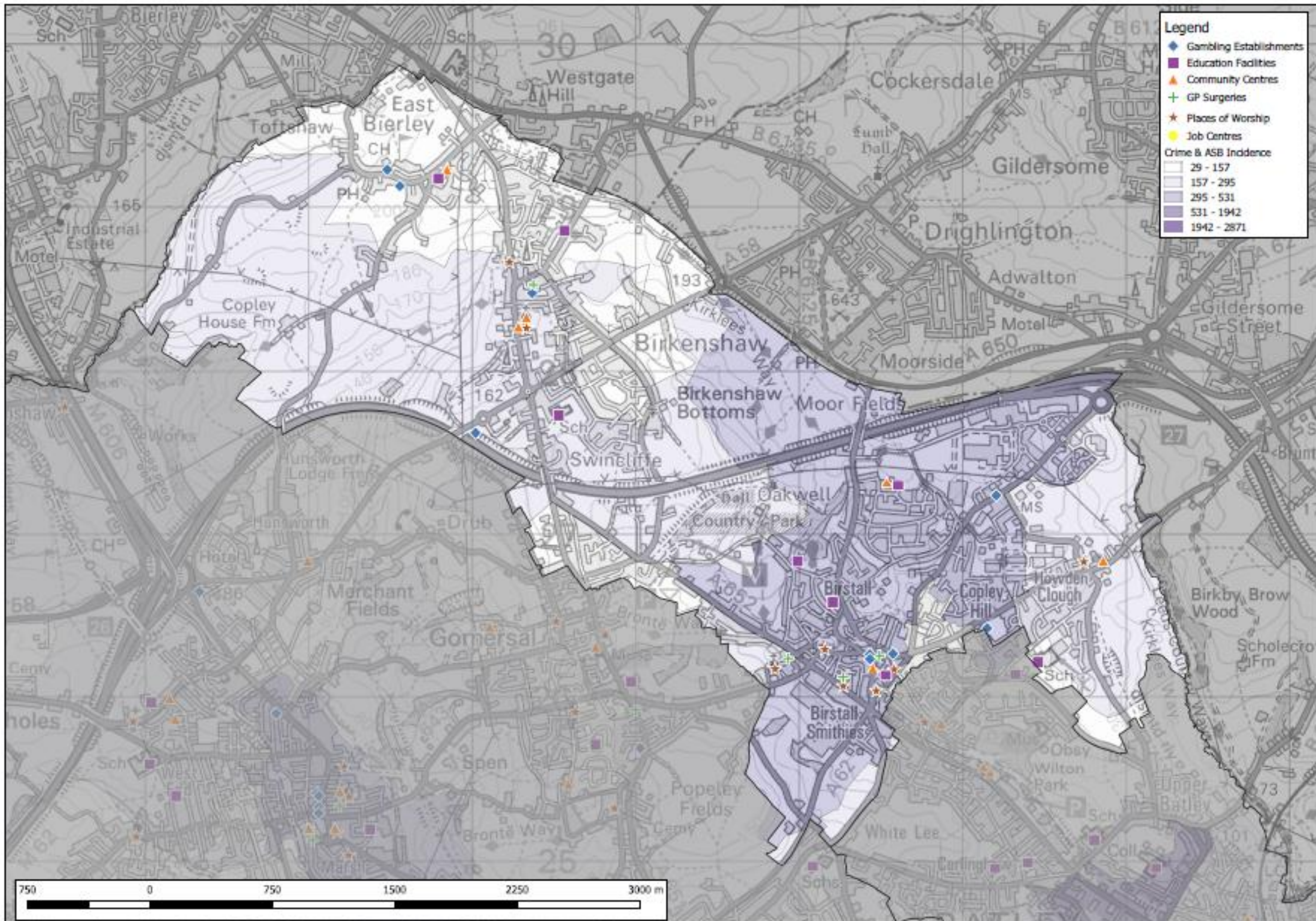
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Young People
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Birstall and Birkenshaw



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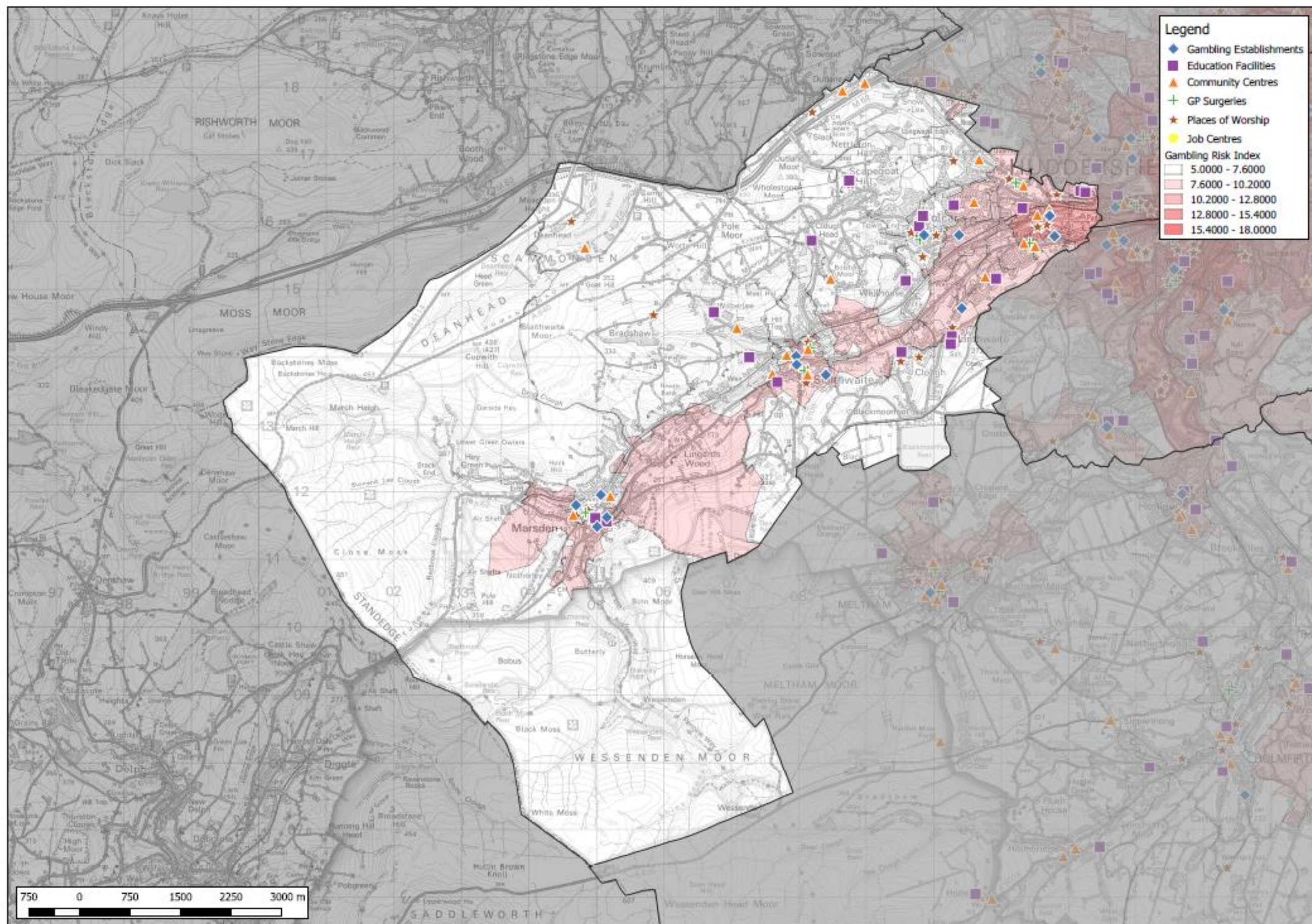
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Gambling Local Area Profile – All Risk Factors Combined - Colne Valley



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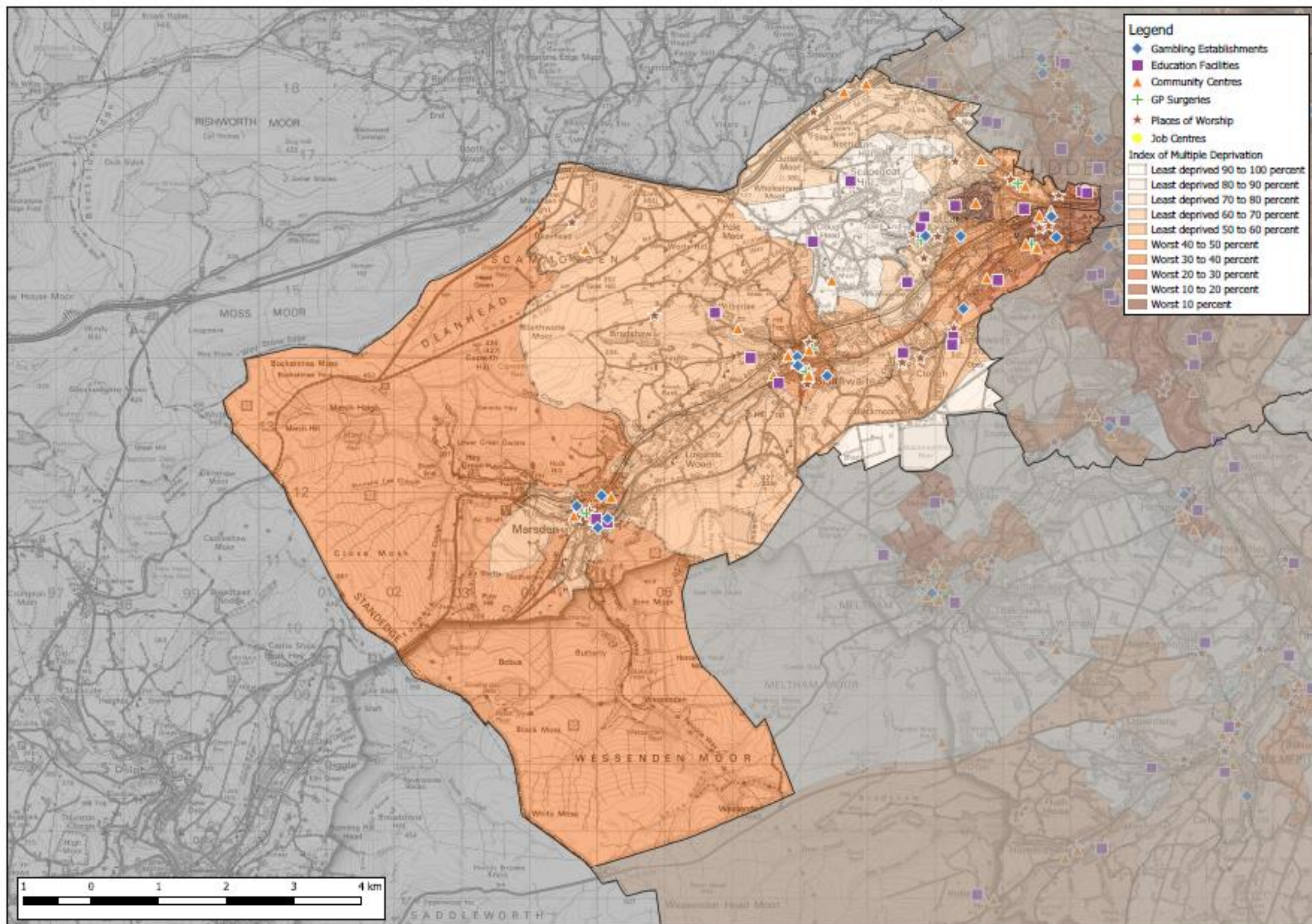
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Colne Valley



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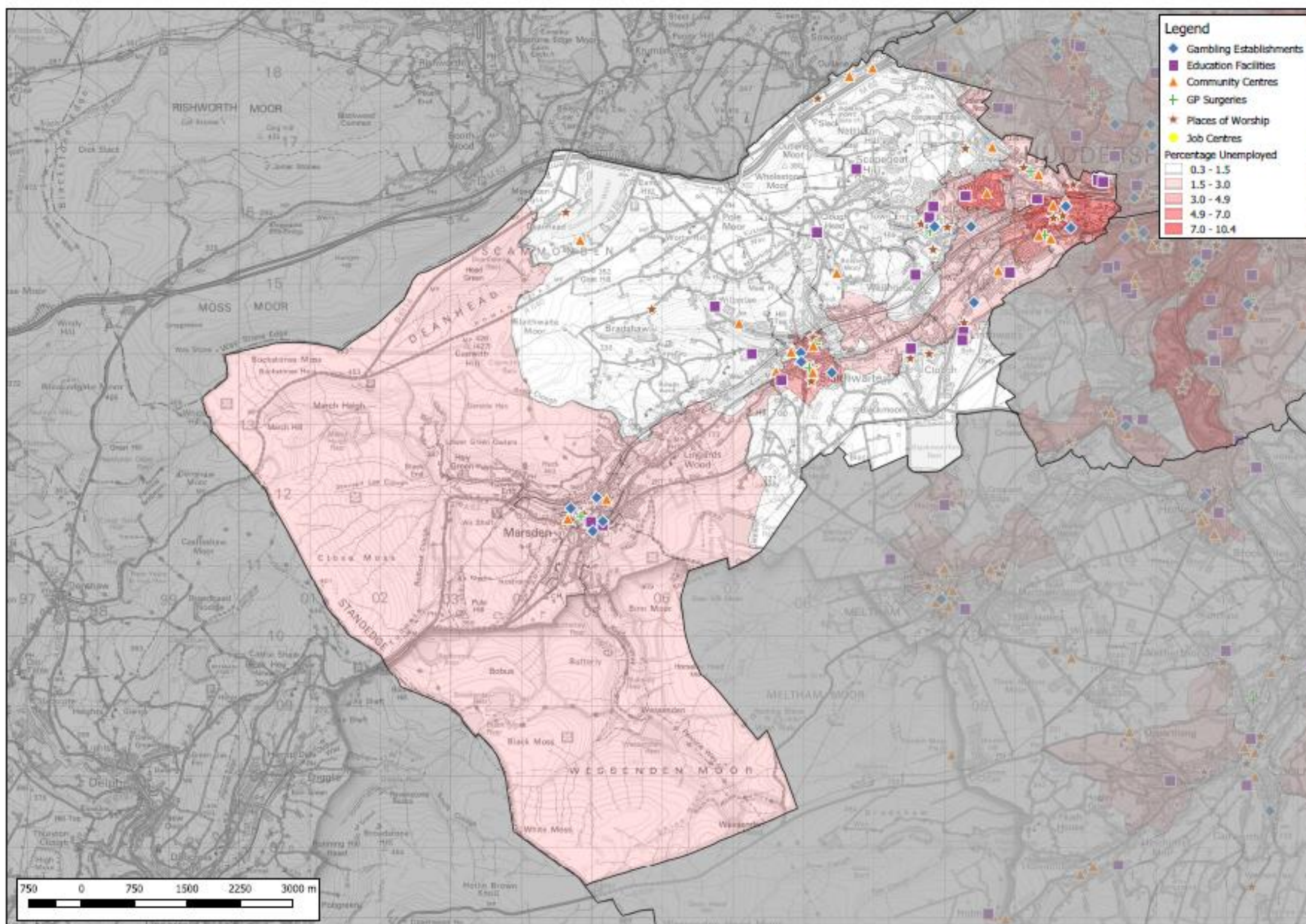
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Gambling Local Area Profile - Percentage Unemployment - Colne Valley



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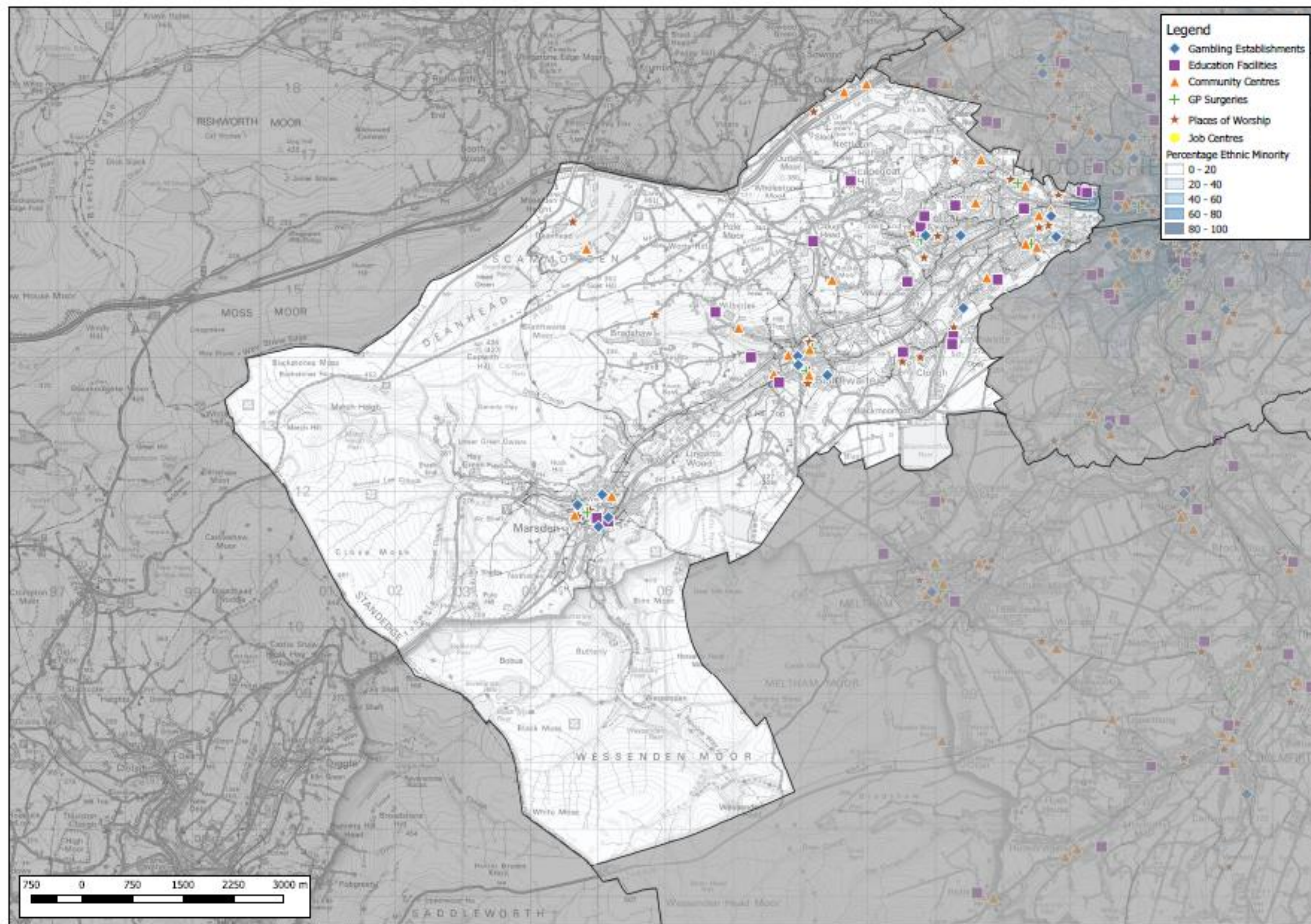
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Gambling Local Area Profile - Percentage Ethnic Minorities - Colne Valley



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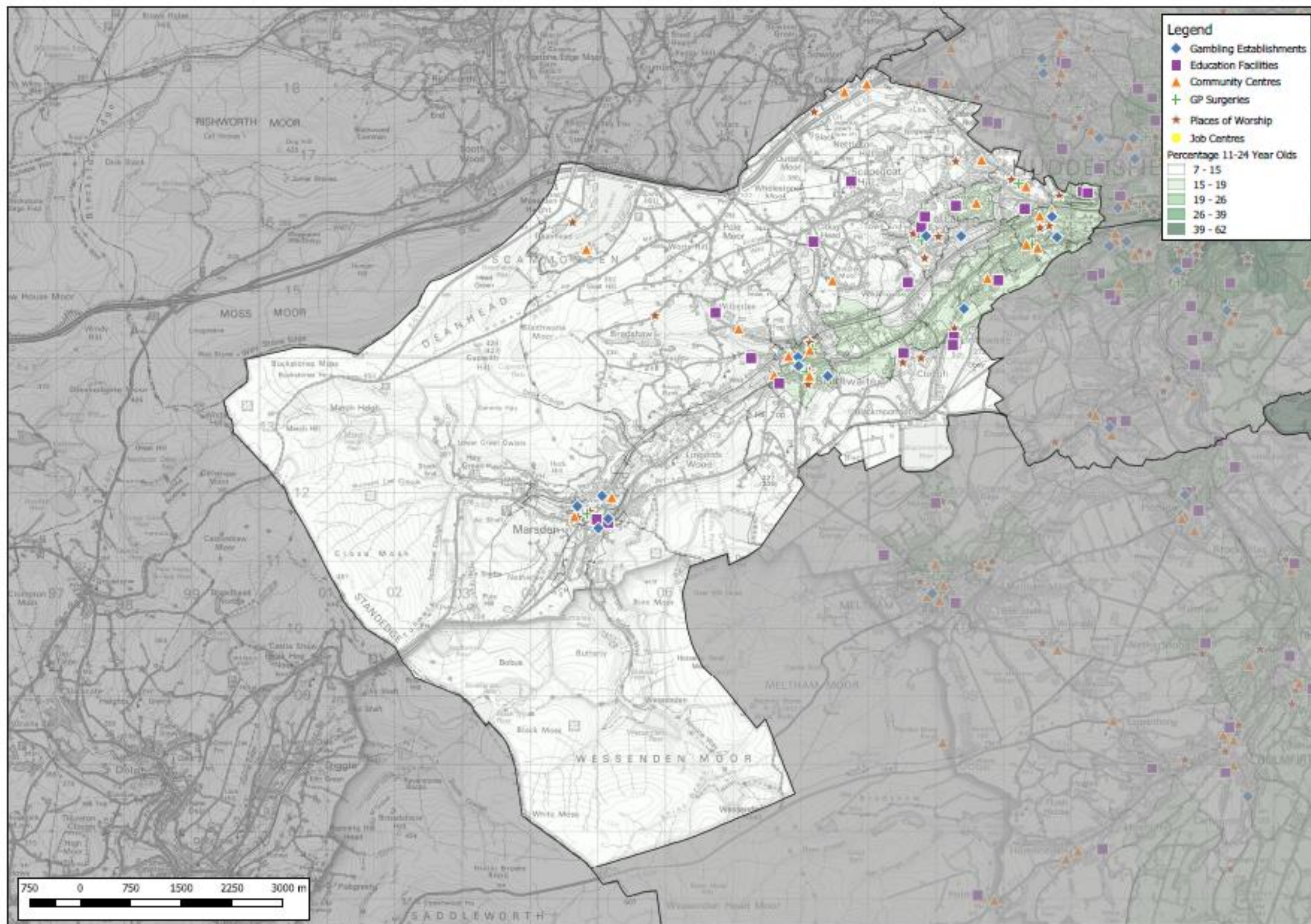
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Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Colne Valley



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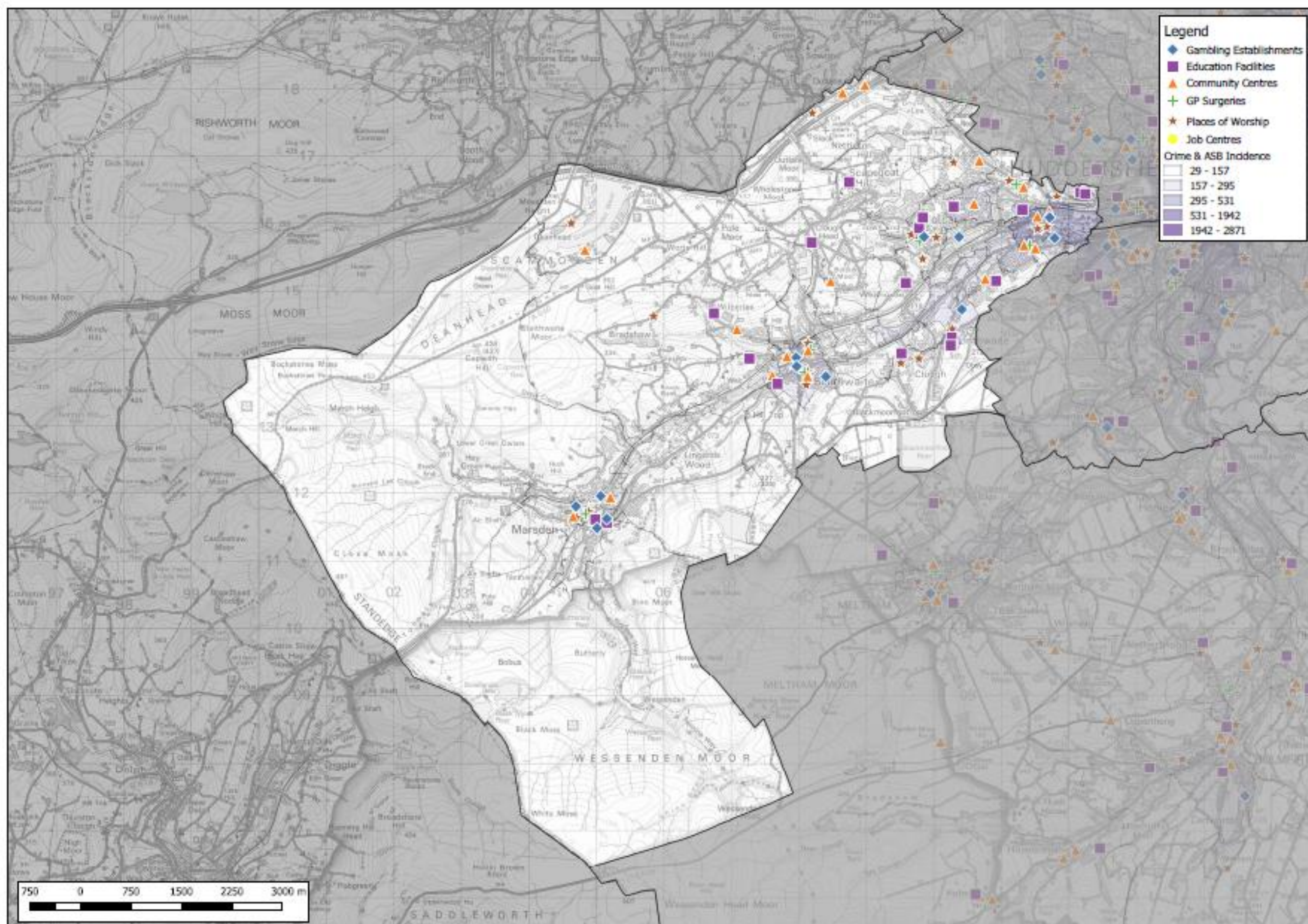
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Colne Valley



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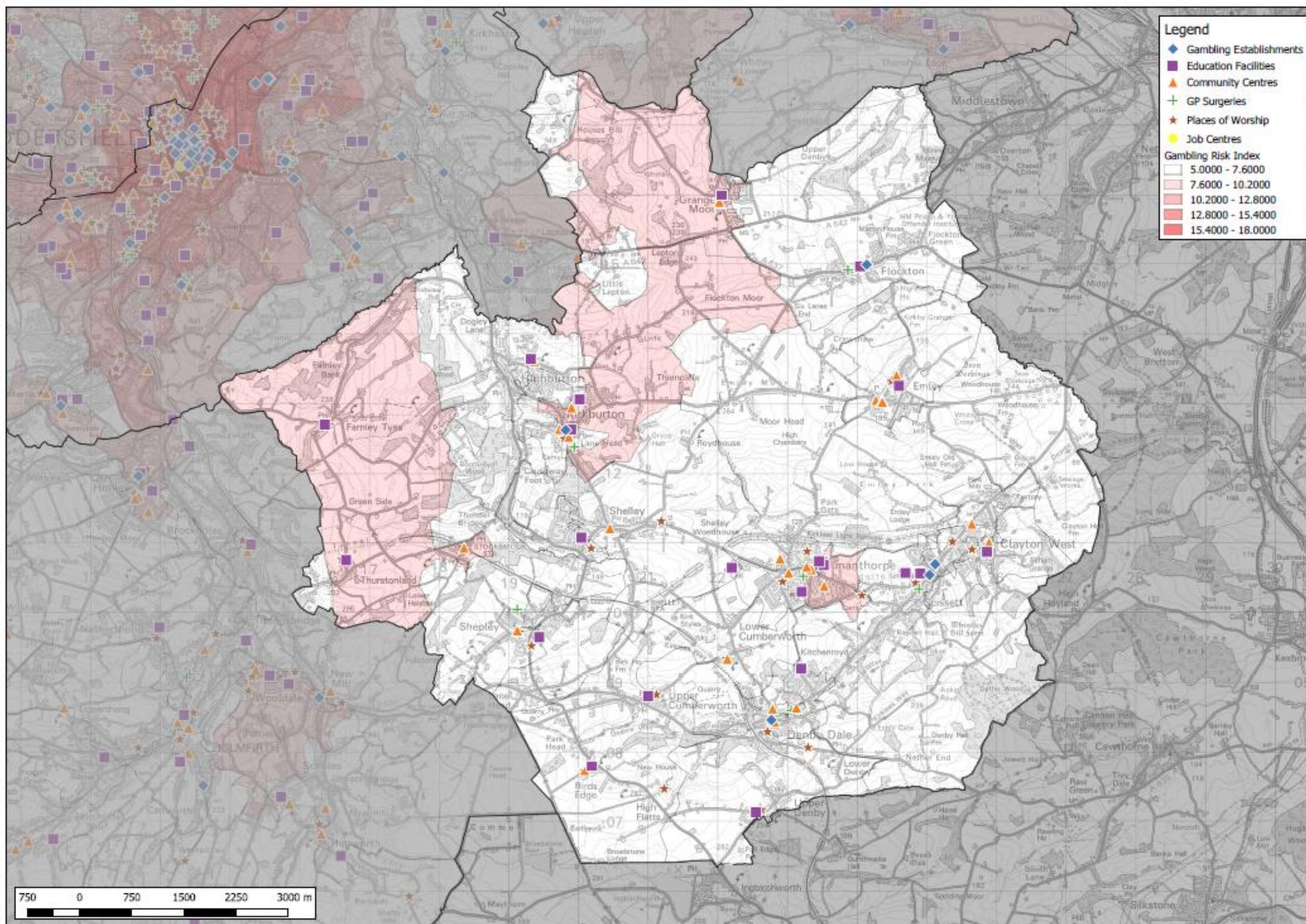
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Gambling Local Area Profile – All Risk Factors Combined - Denby Dale and Kirkburton



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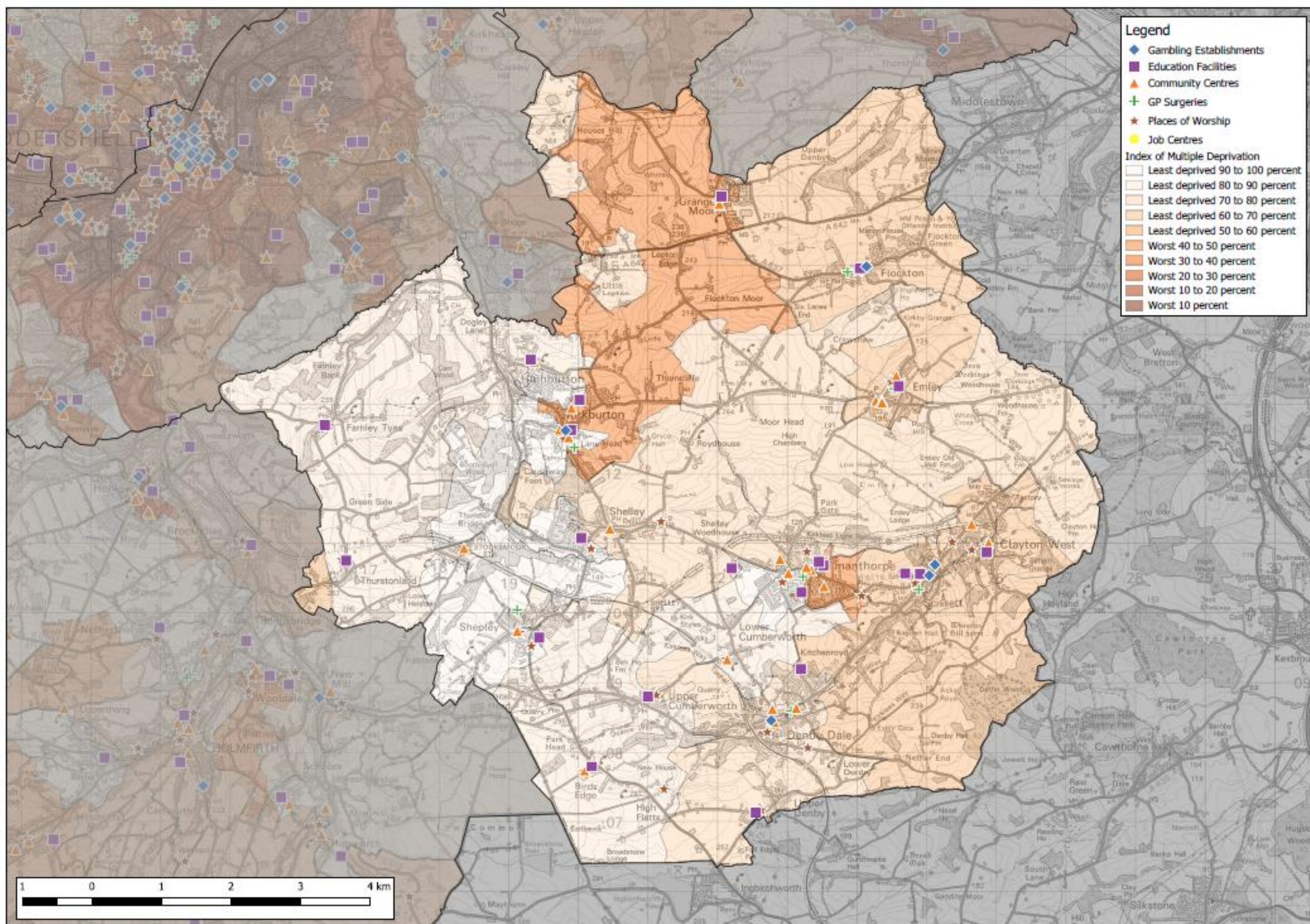
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Denby Dale and Kirkburton



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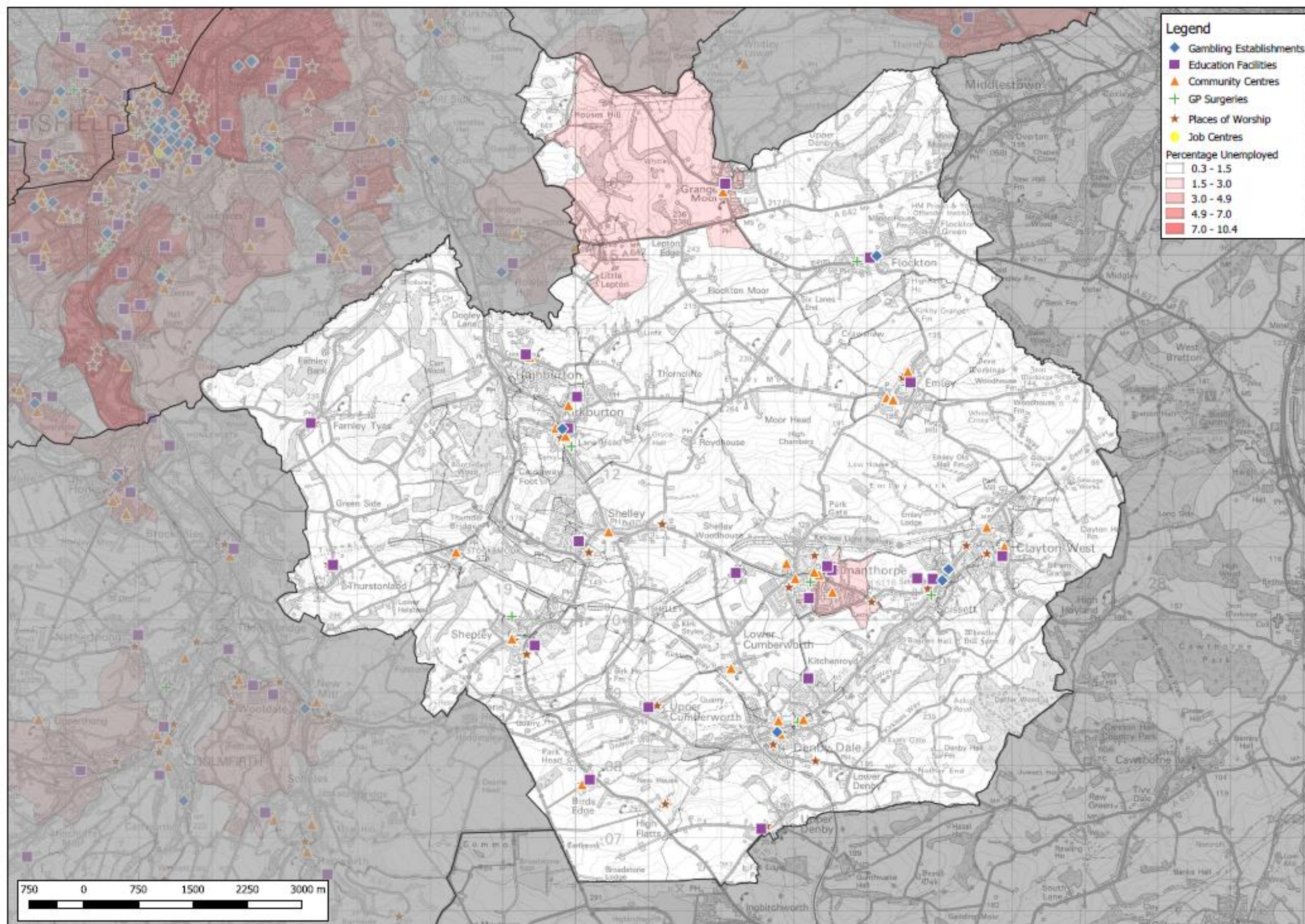
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Gambling Local Area Profile - Percentage Unemployment - Denby Dale and Kirkburton



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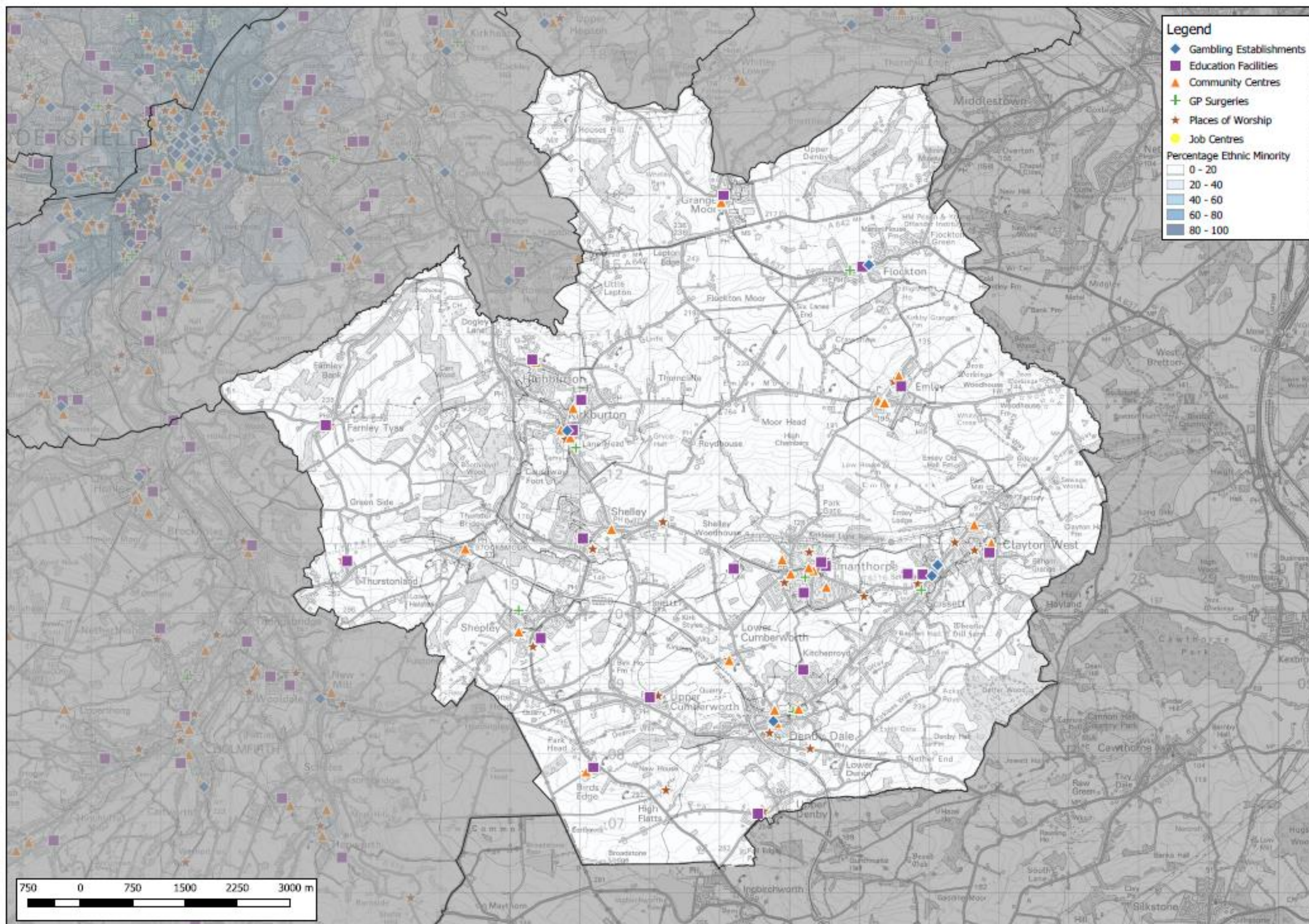
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Gambling Local Area Profile - Percentage Ethnic Minorities - Denby Dale and Kirkburton



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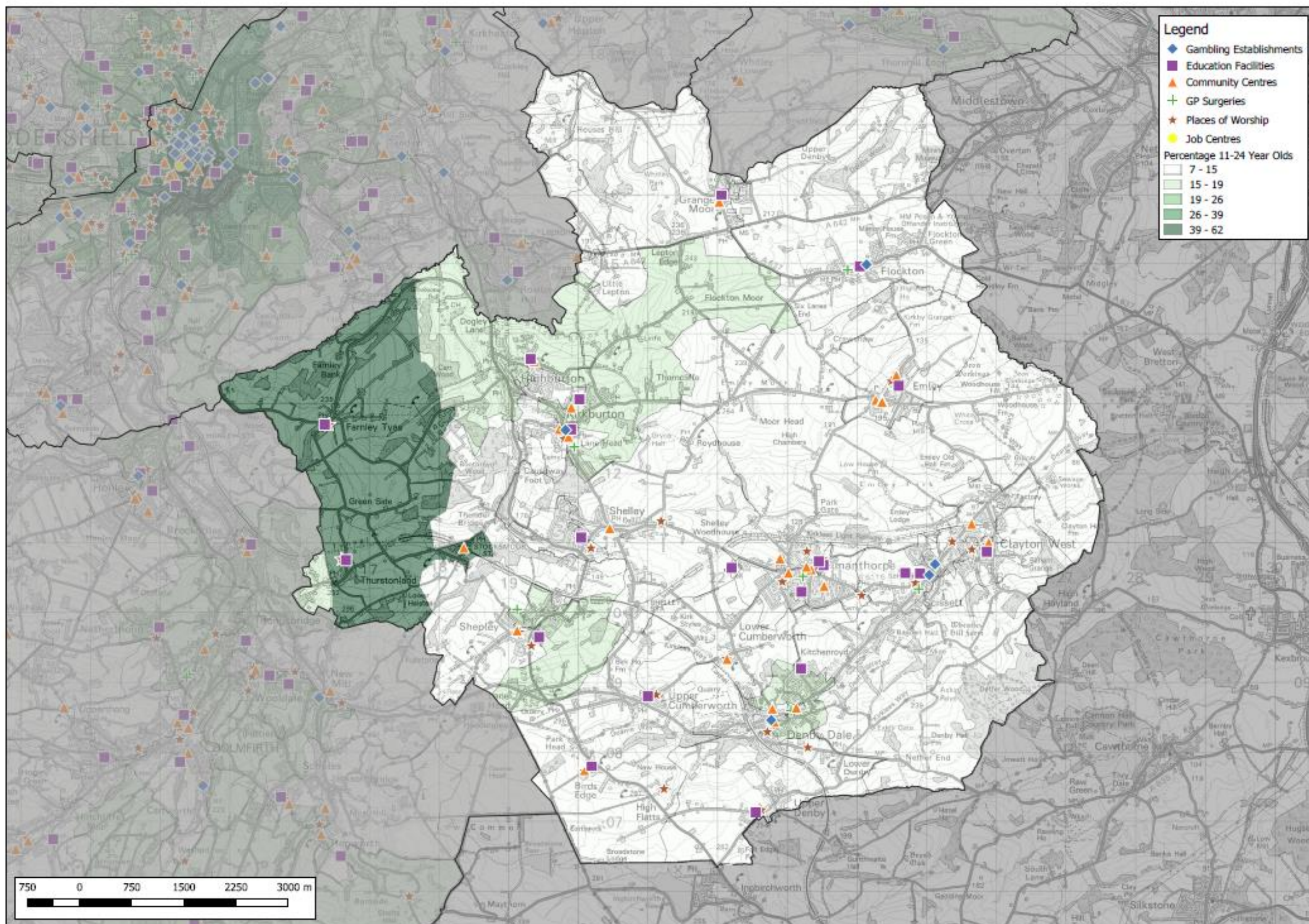
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Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Denby Dale and Kirkburton



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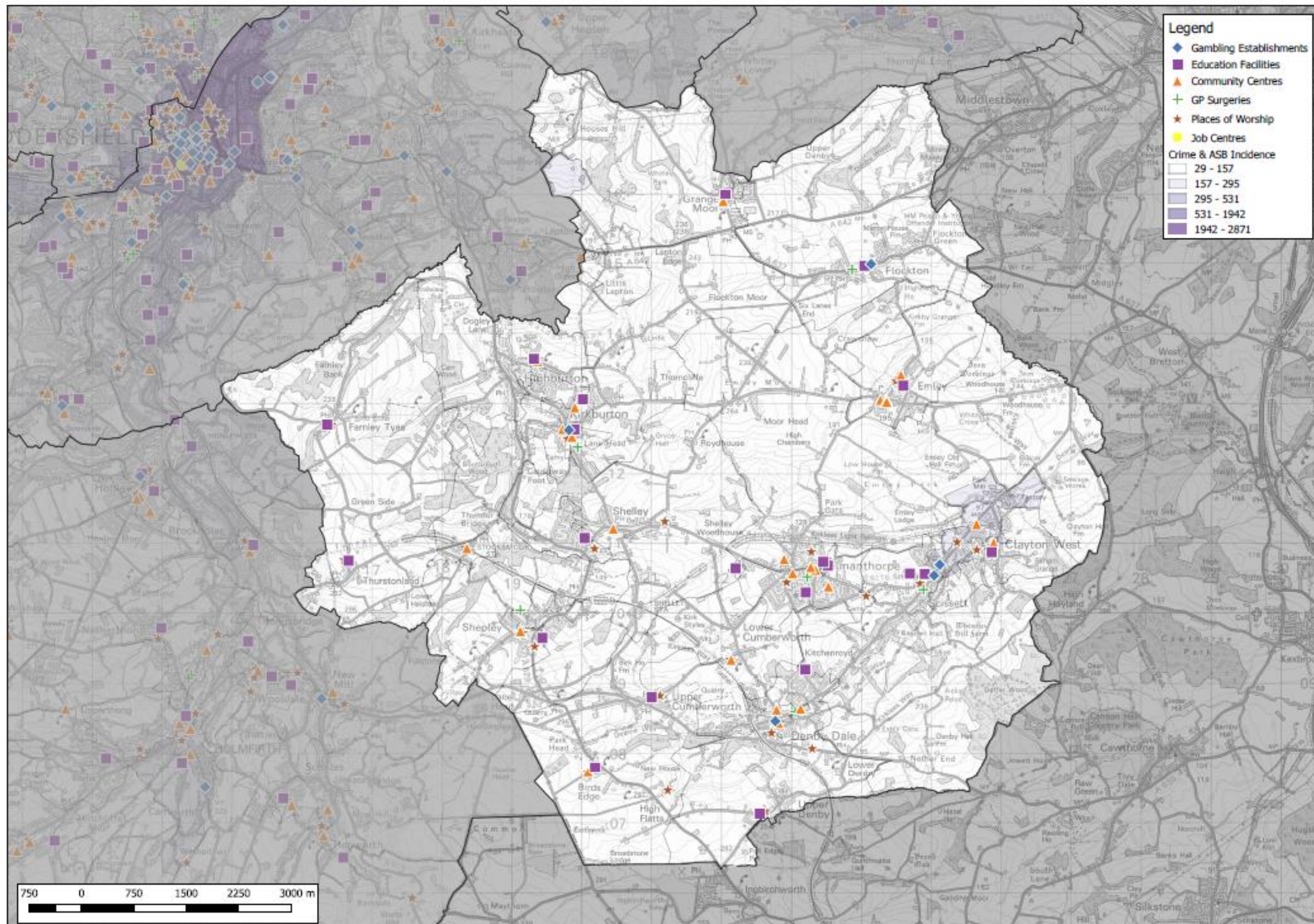
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Denby Dale and Kirkburton



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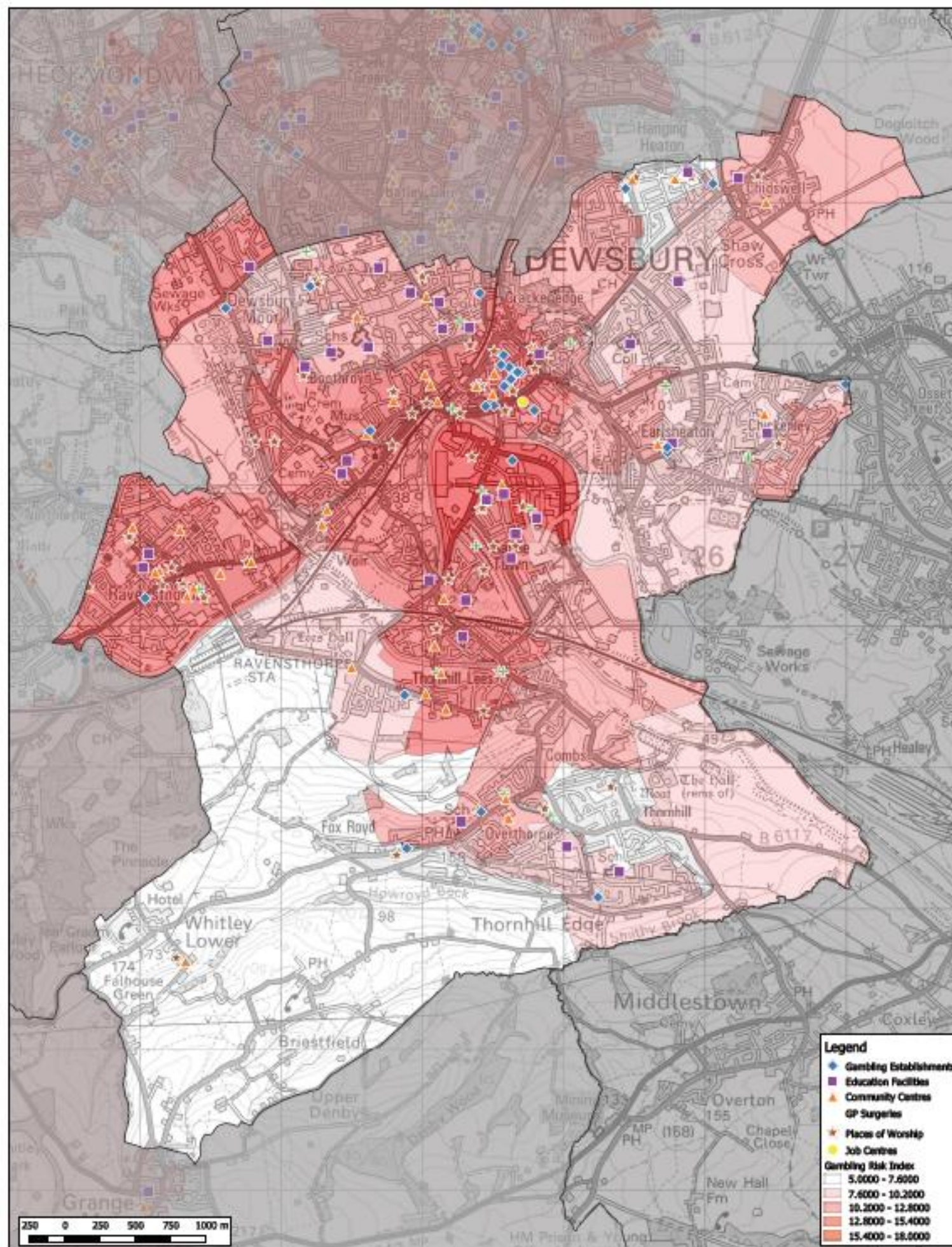
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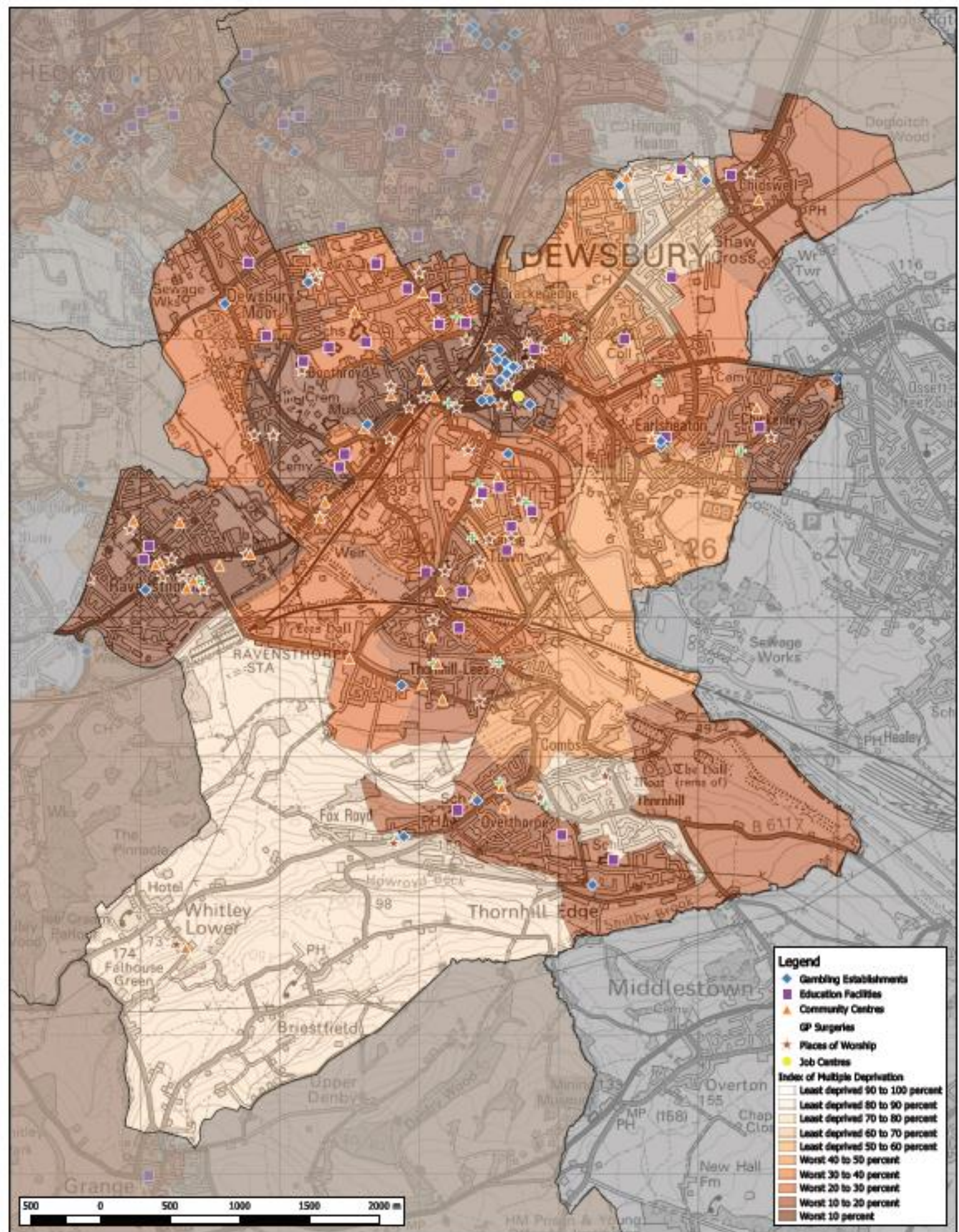
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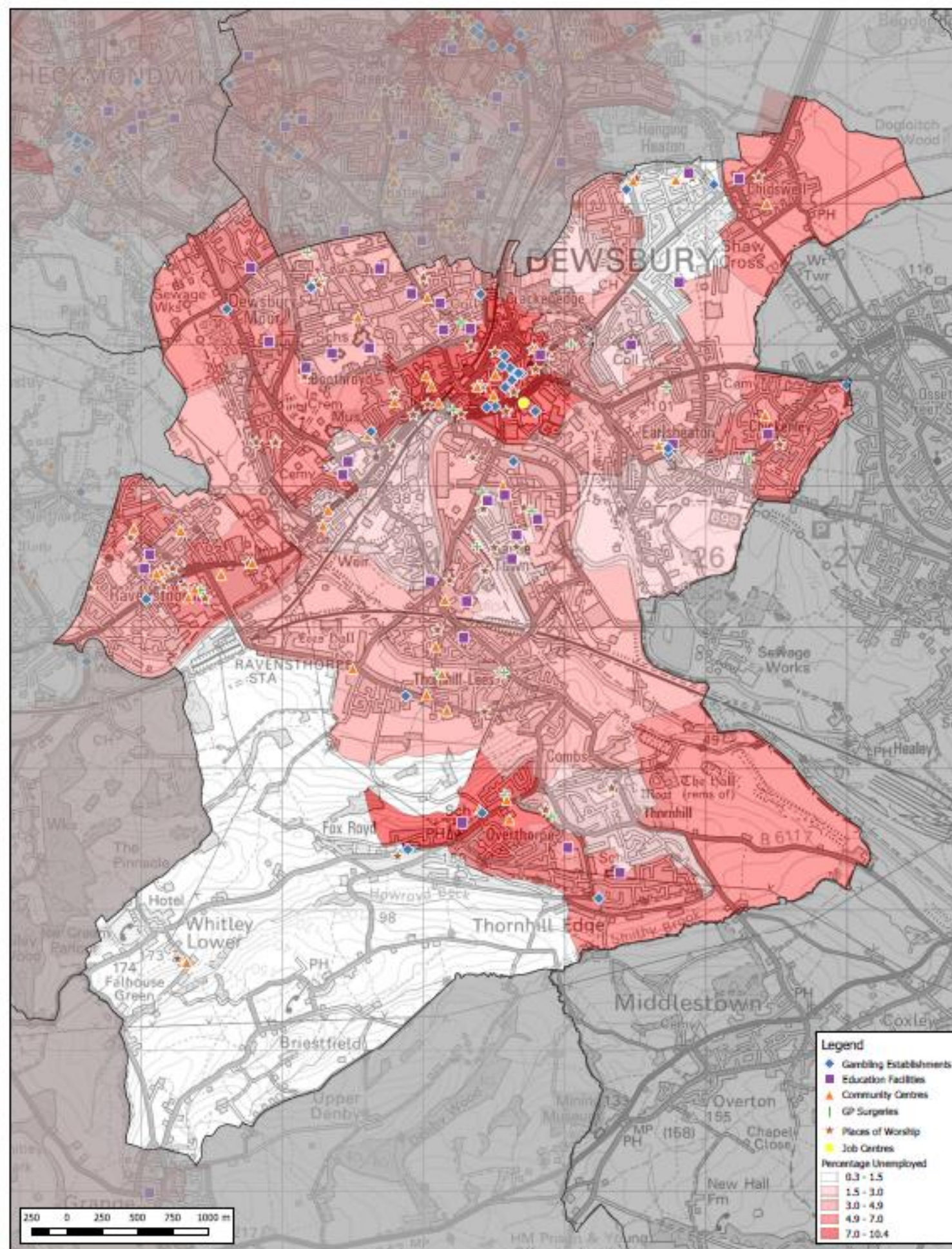
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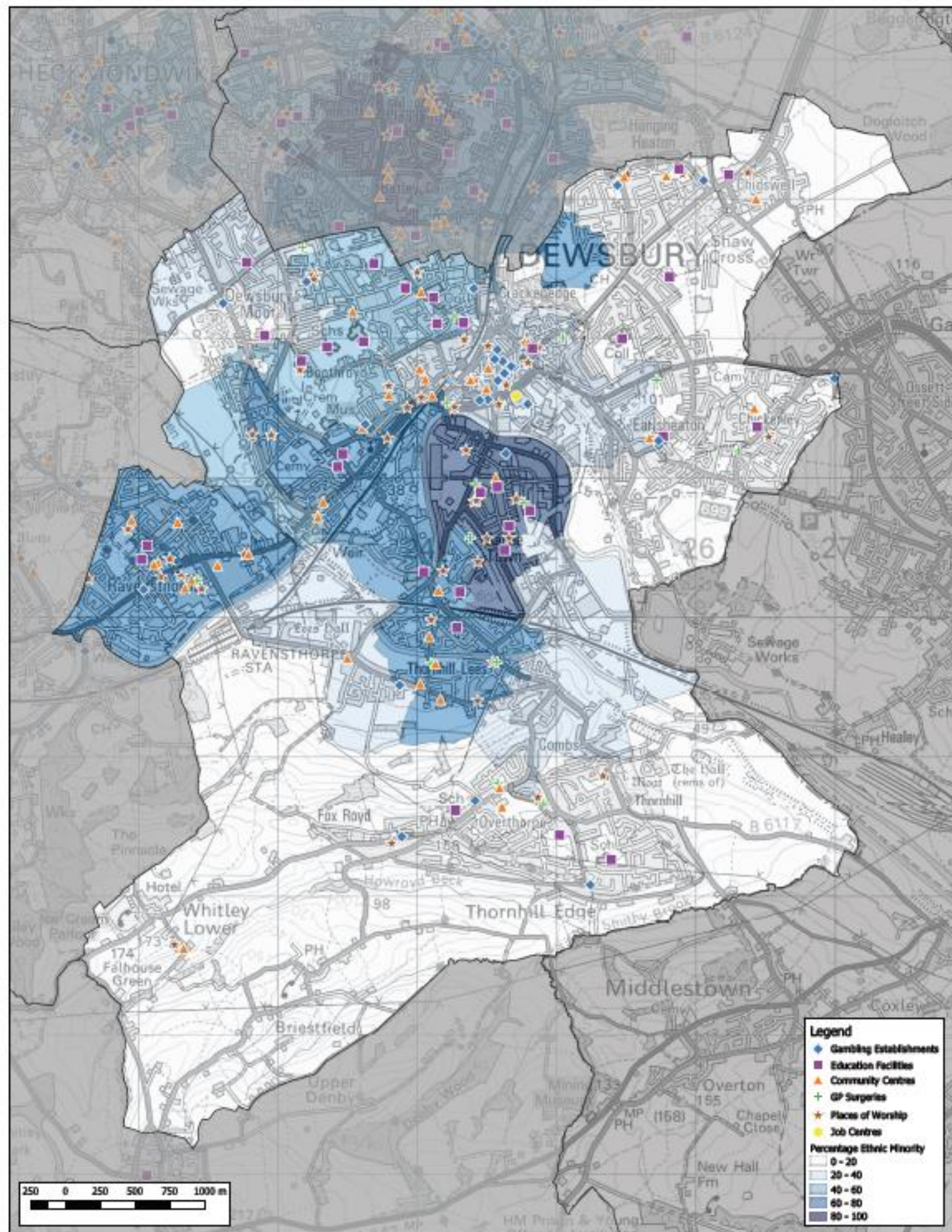
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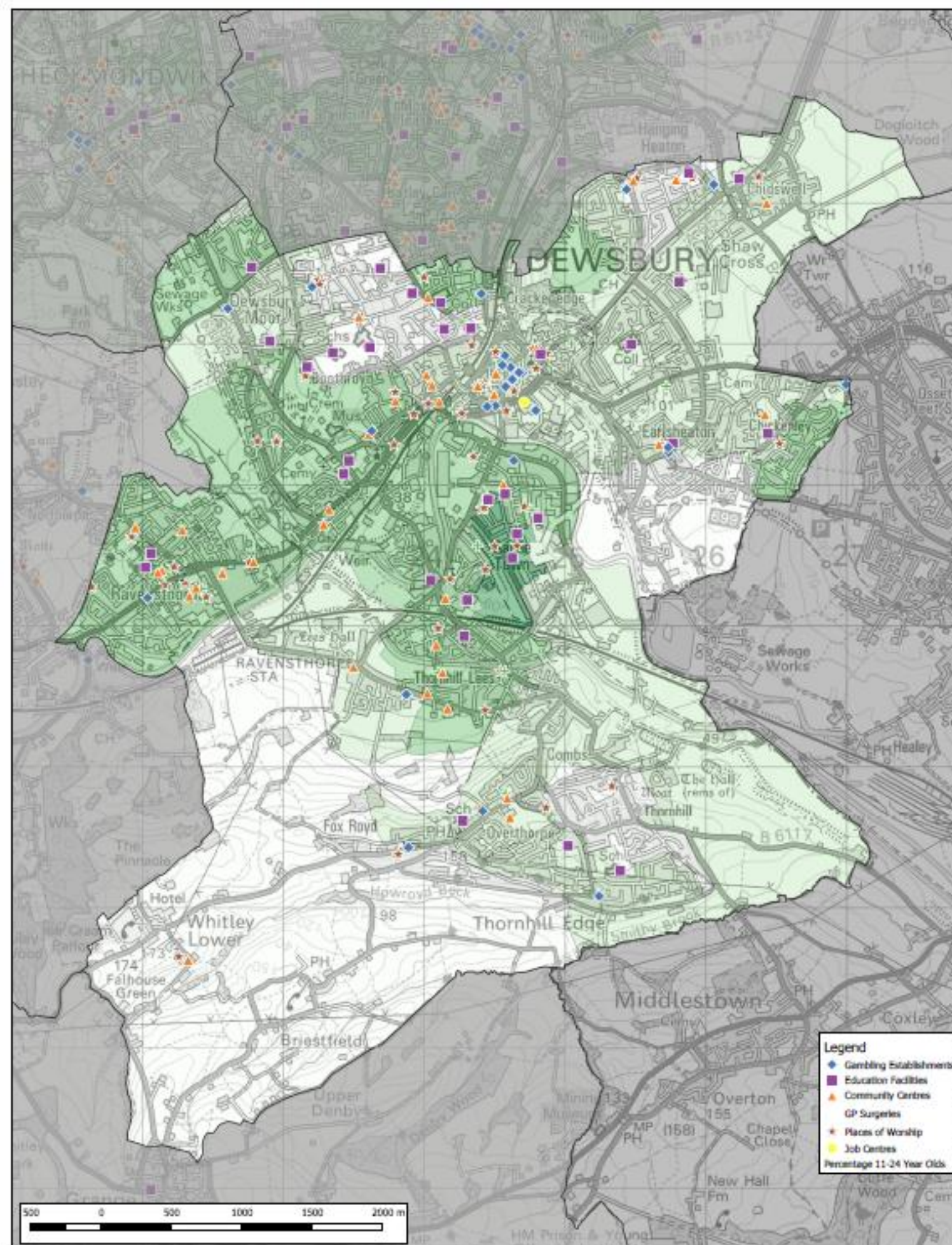


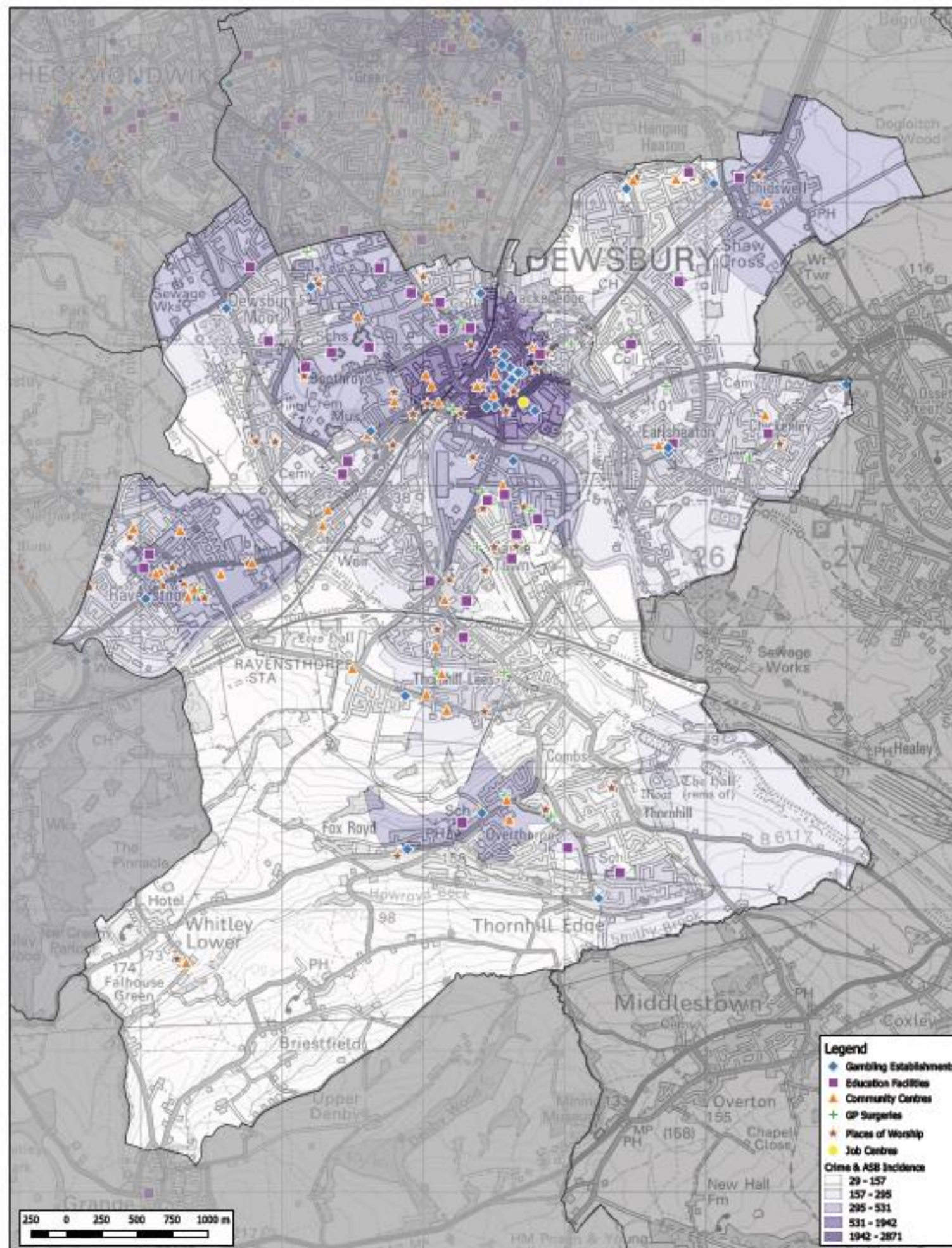




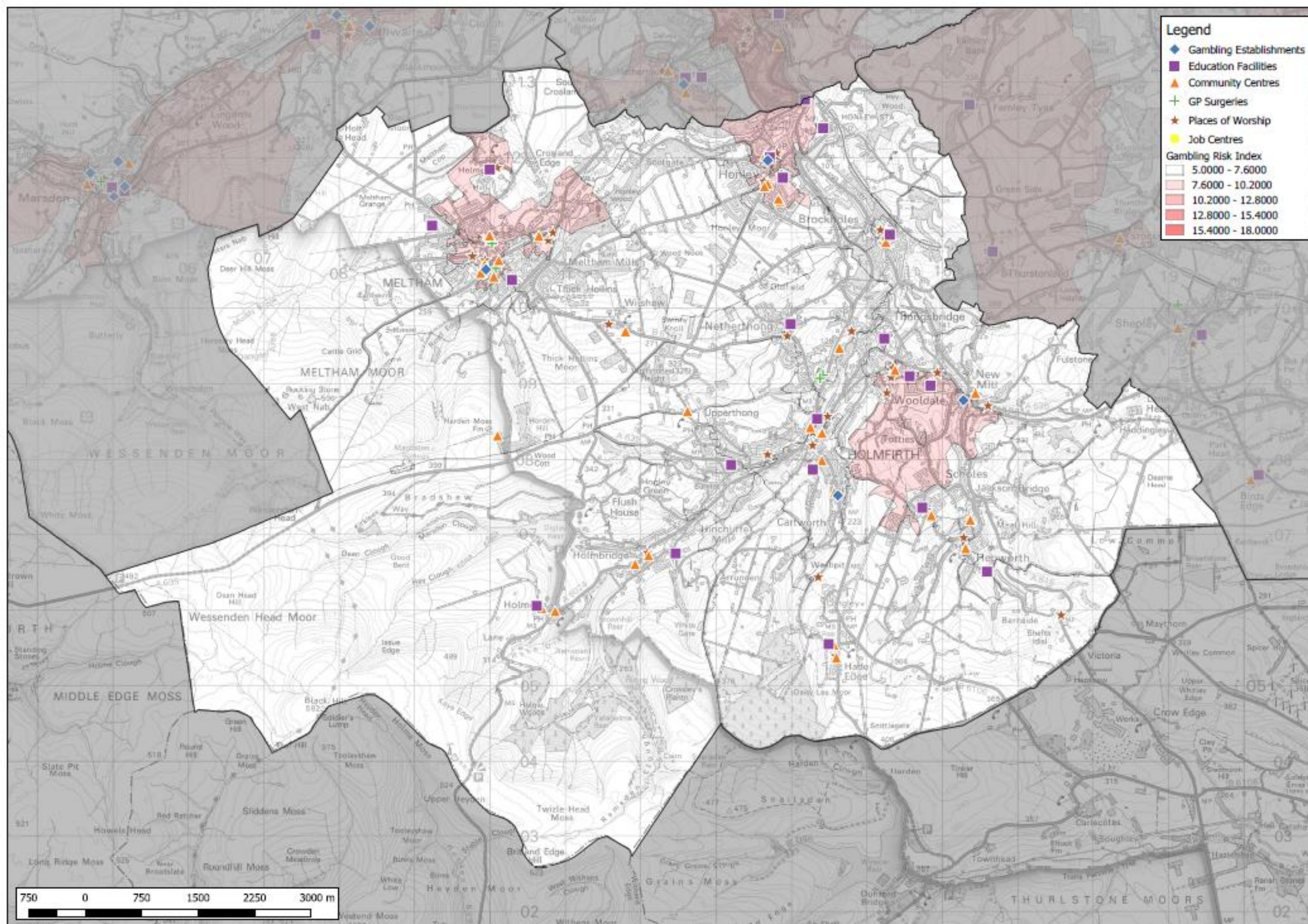








Gambling Local Area Profile – All Risk Factors Combined - Holme Valley



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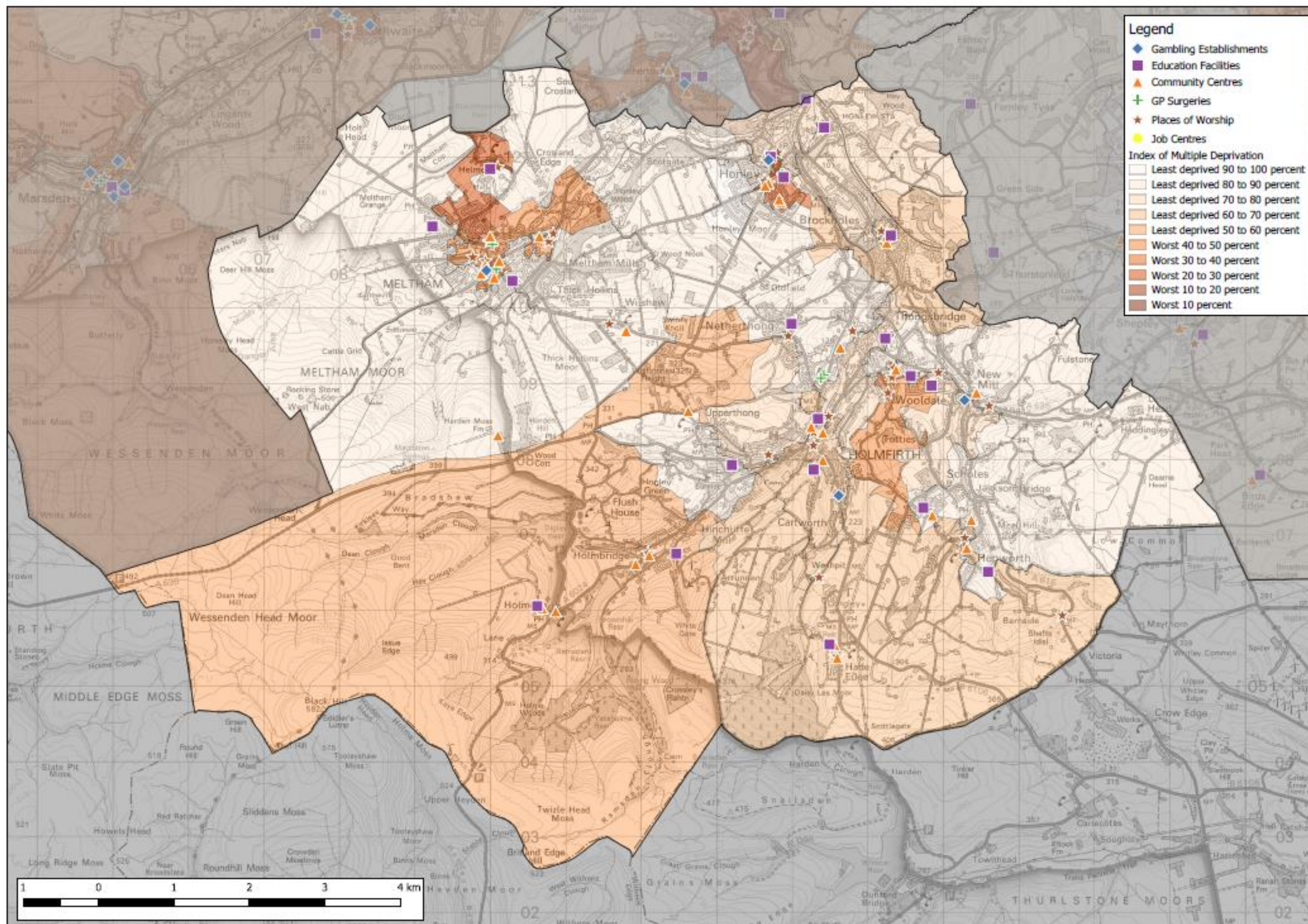
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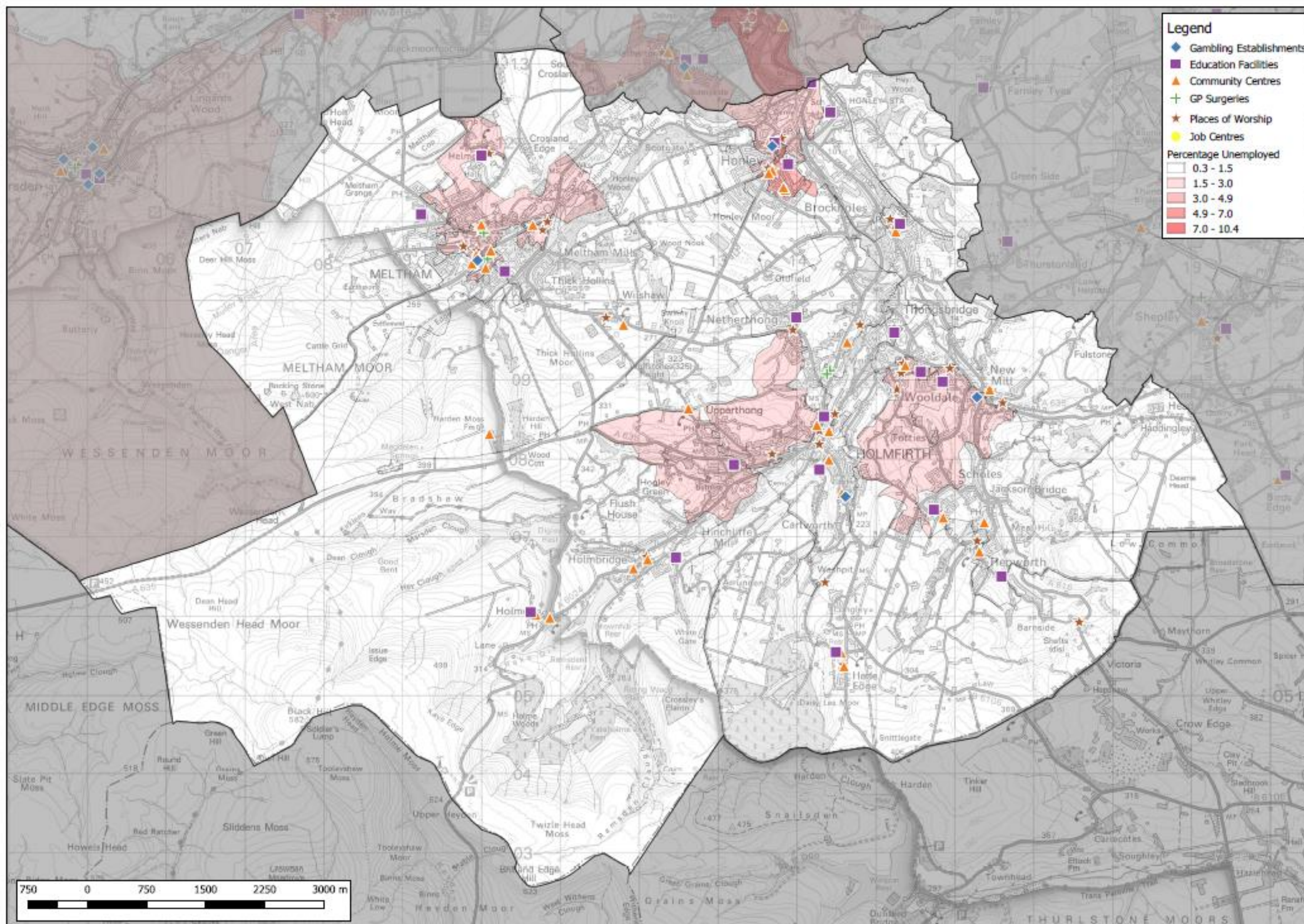
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Holme Valley



Gambling Local Area Profile - Percentage Unemployment - Holme Valley



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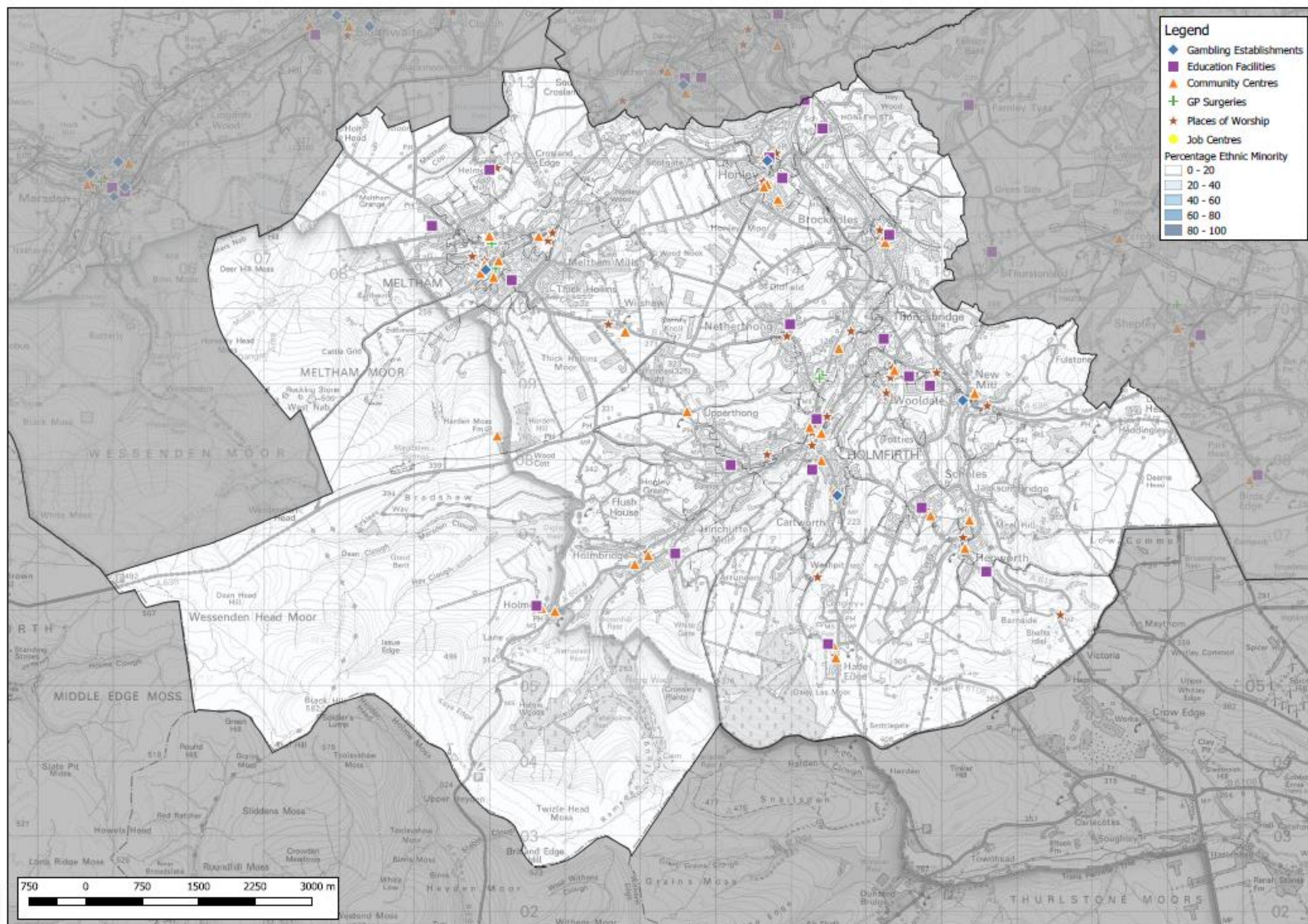
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Gambling Local Area Profile - Percentage Ethnic Minorities - Holme Valley



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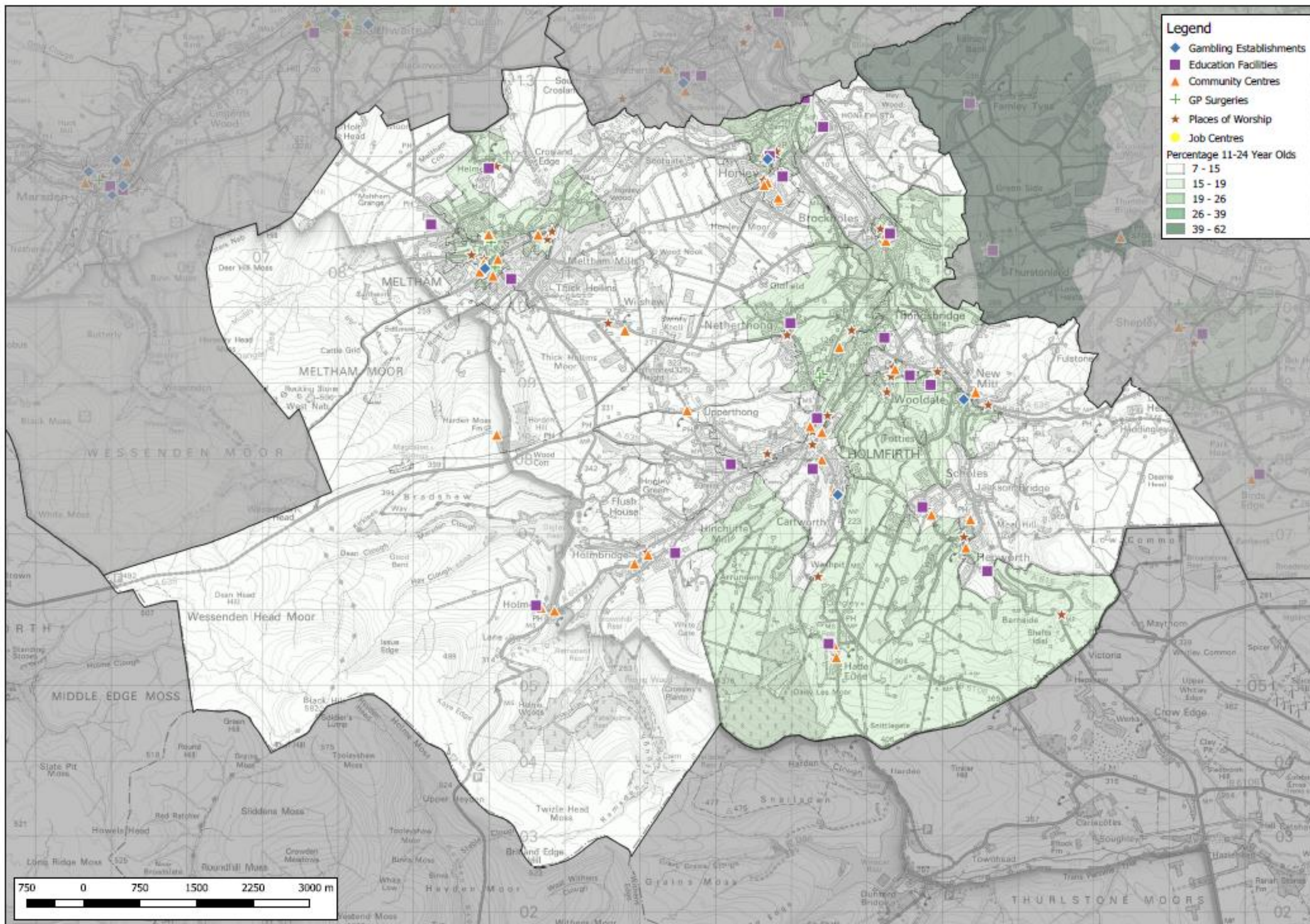
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Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Holme Valley



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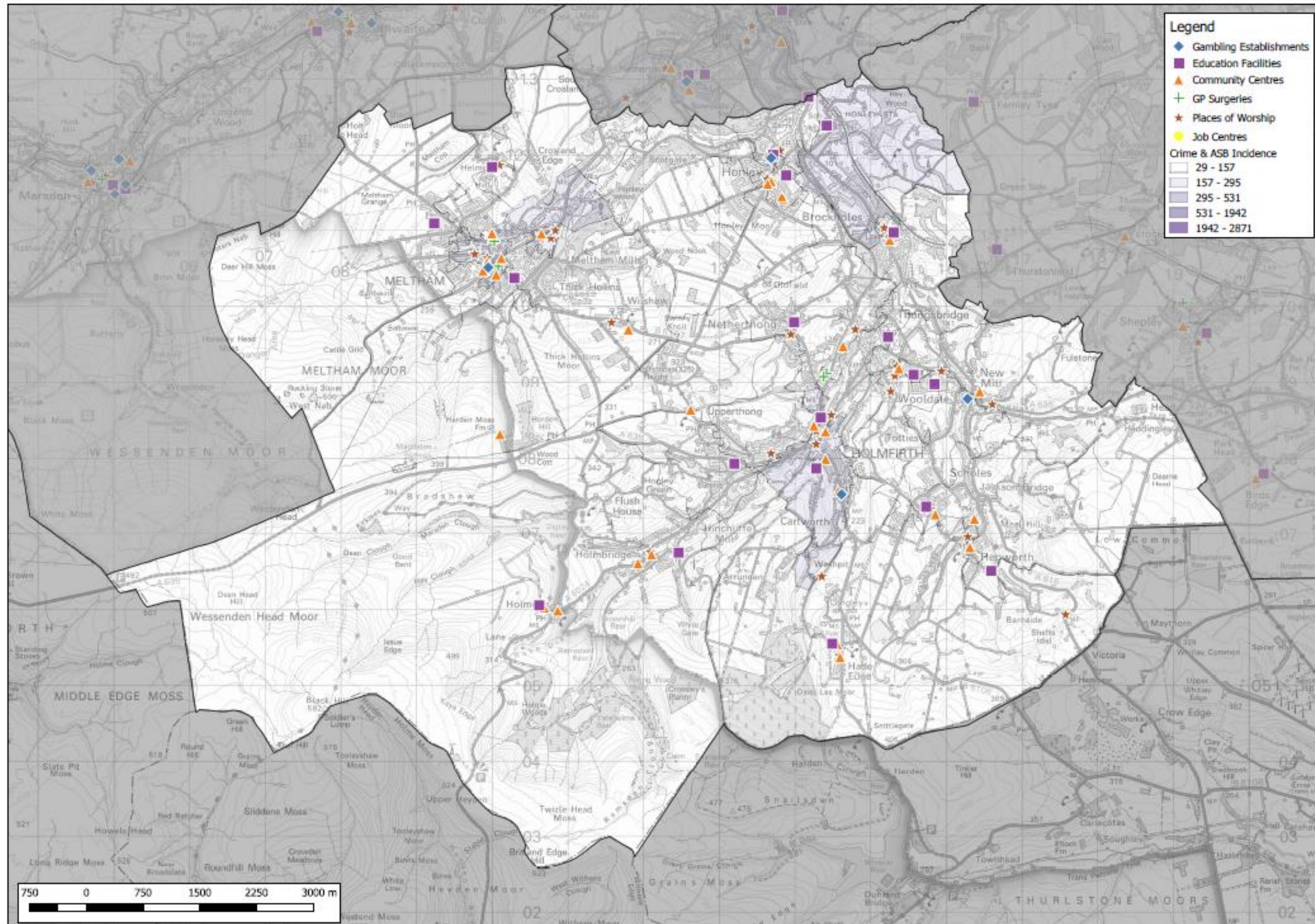
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Holme Valley



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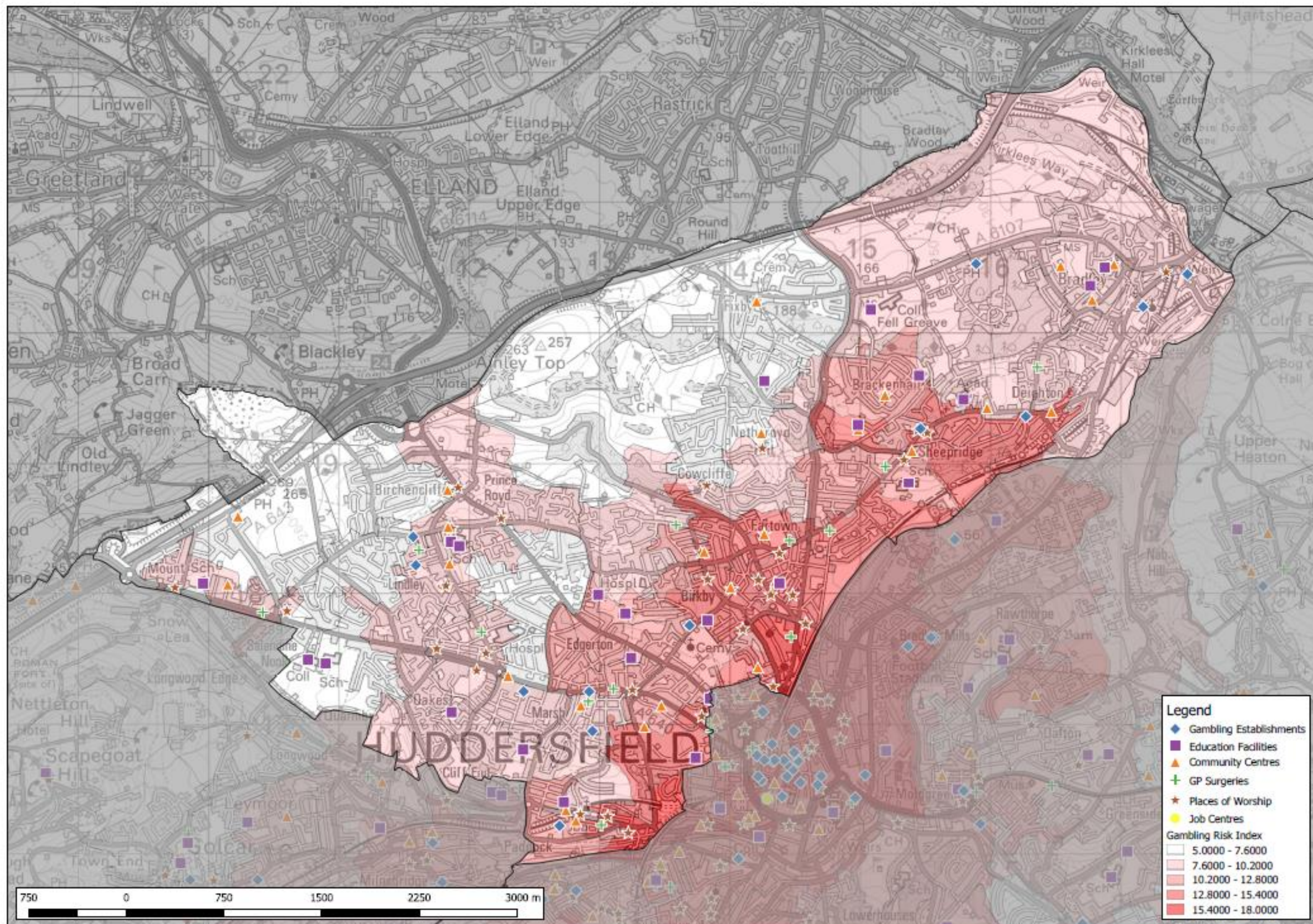
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Gambling Local Area Profile – All Risk Factors Combined - Huddersfield North



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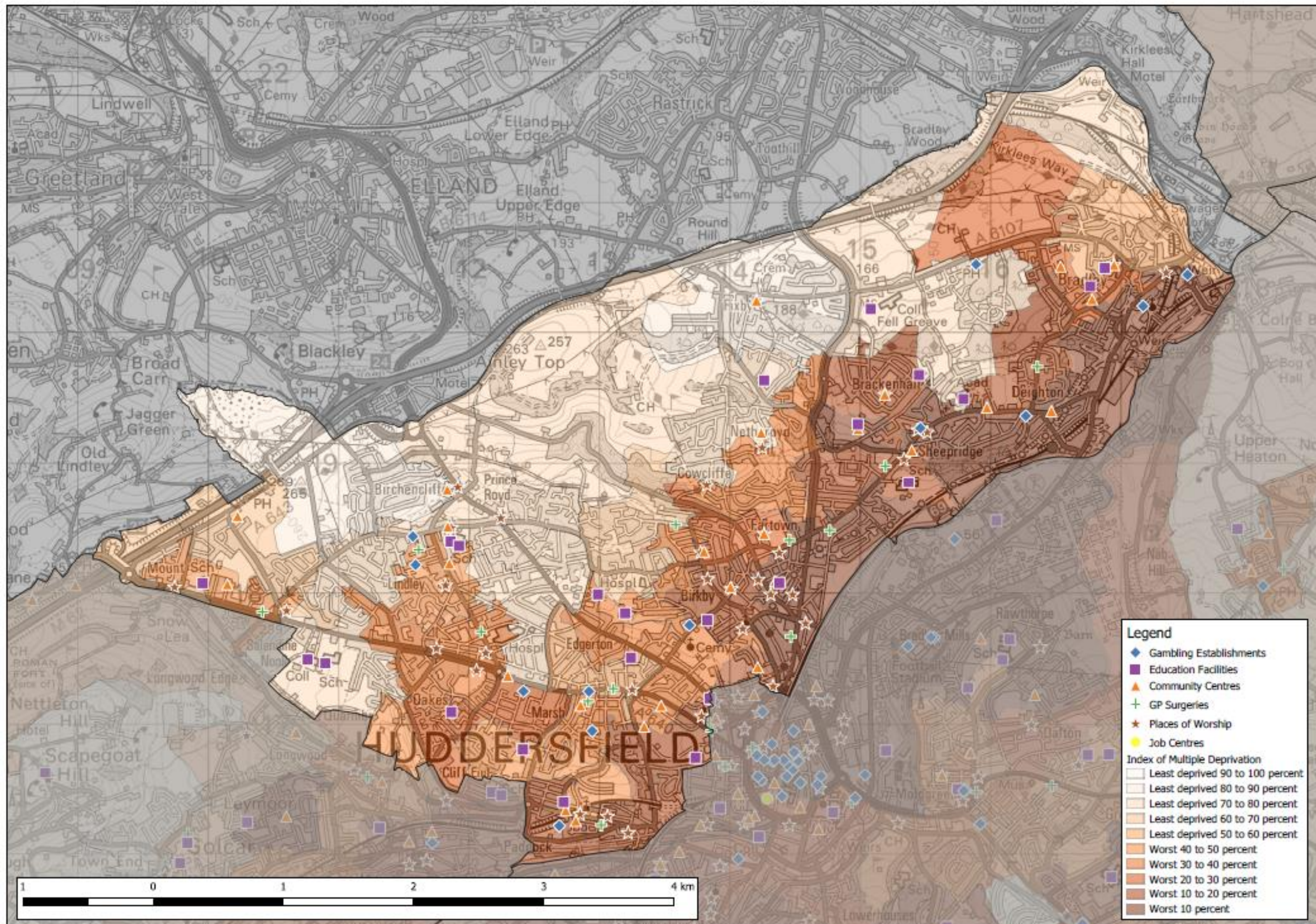
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Huddersfield North



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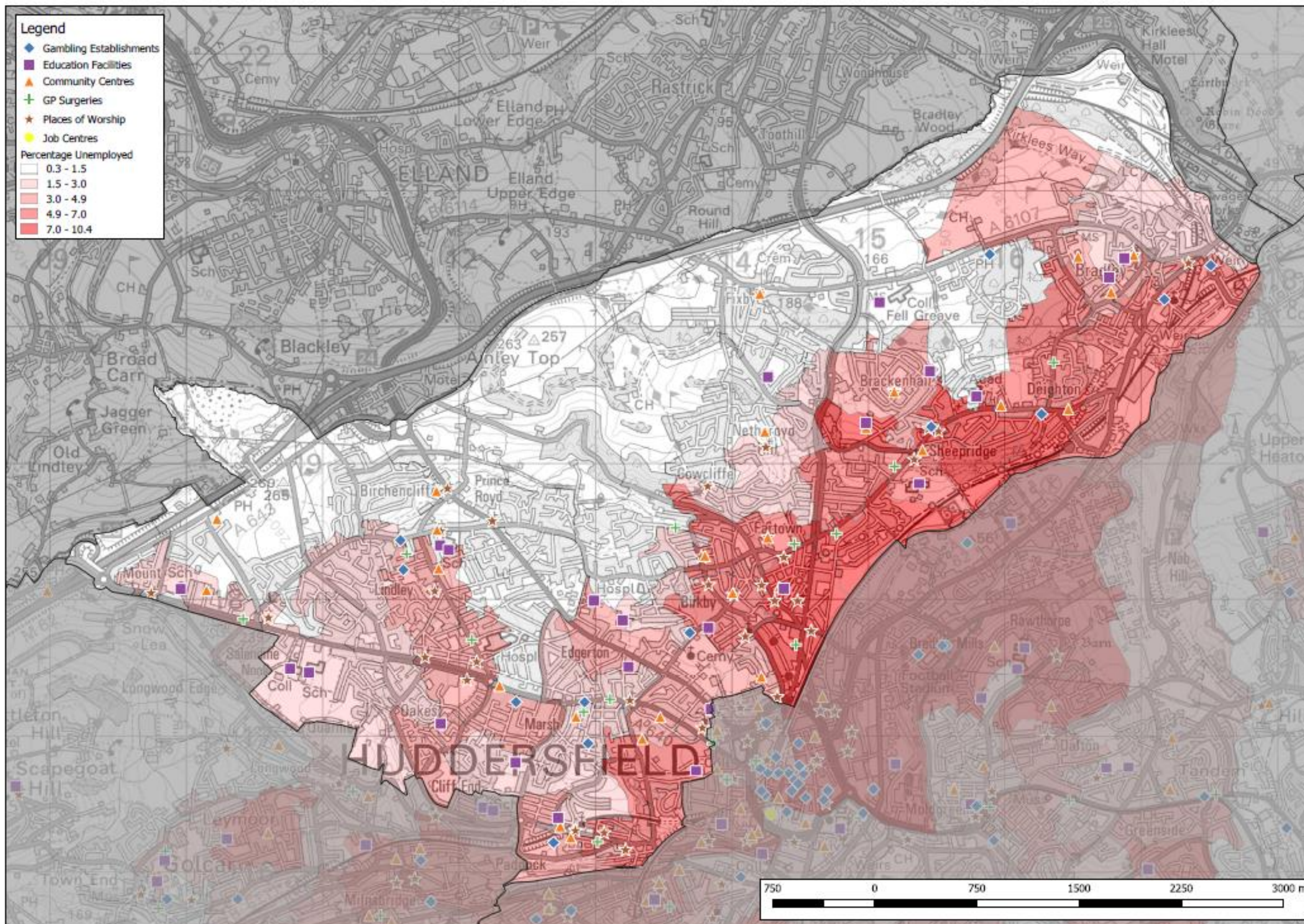
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Gambling Local Area Profile - Percentage Unemployment - Huddersfield North



Gambling Local Area Profile - Percentage Ethnic Minorities - Huddersfield North



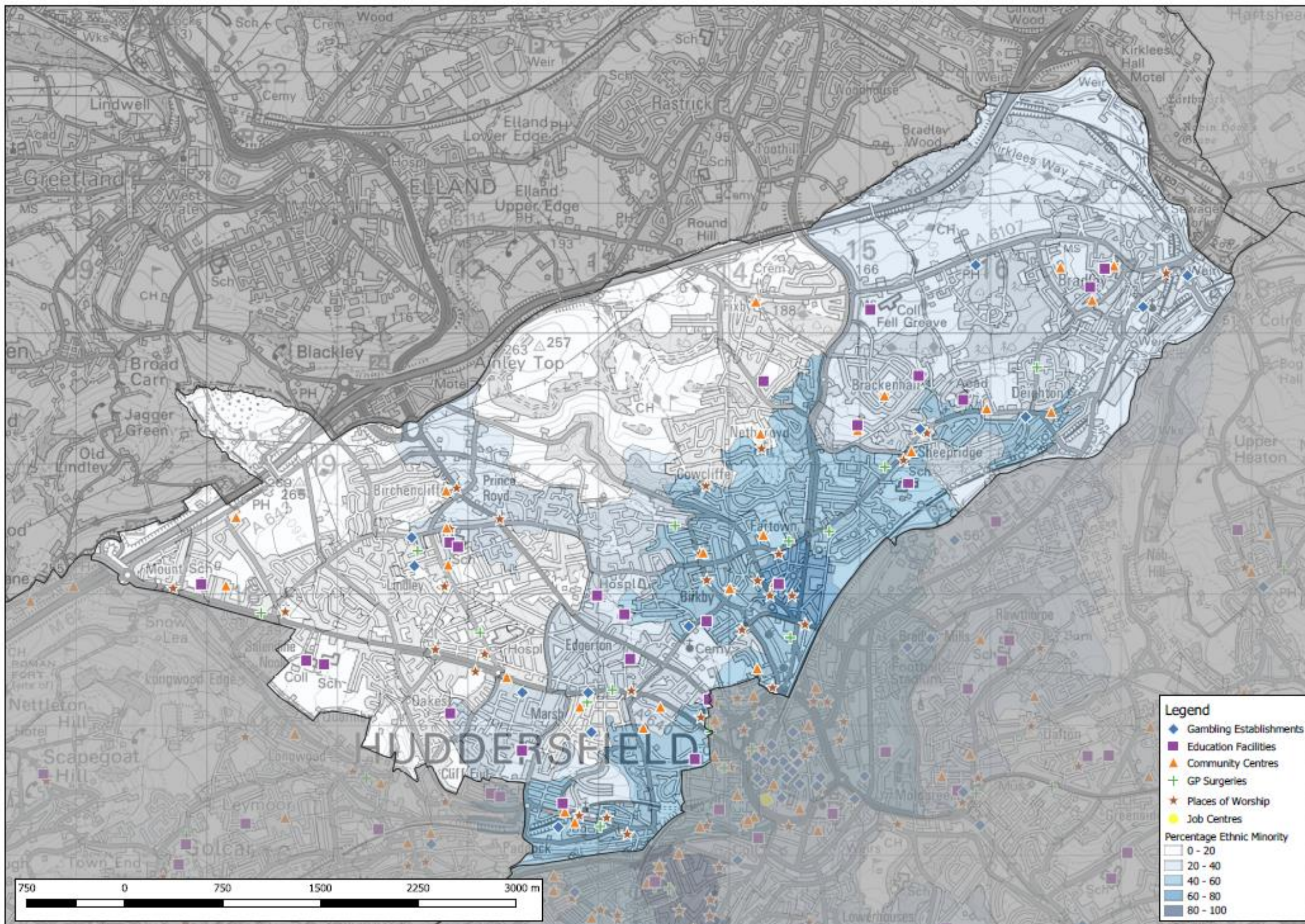
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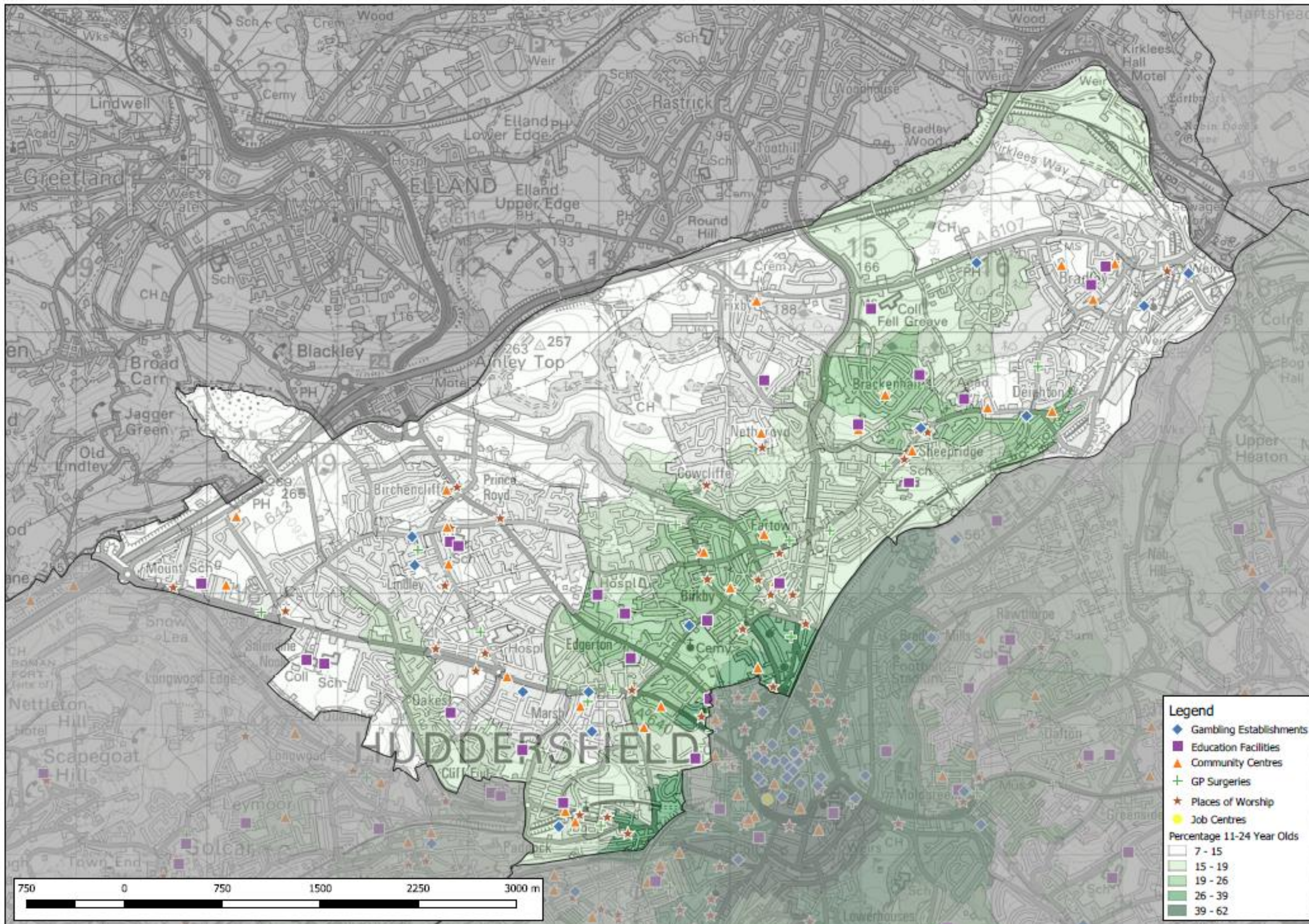
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Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Huddersfield North



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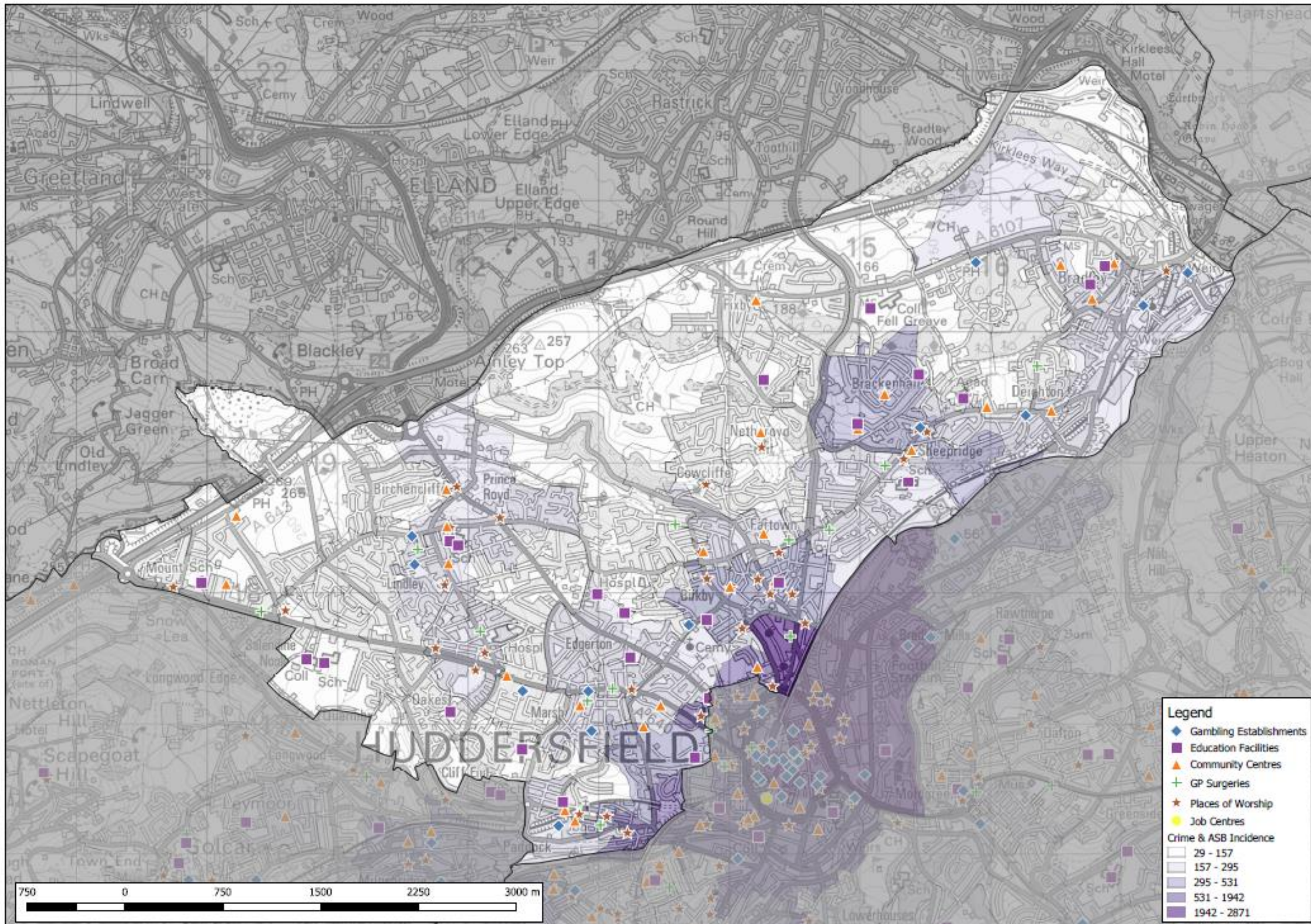
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Huddersfield North



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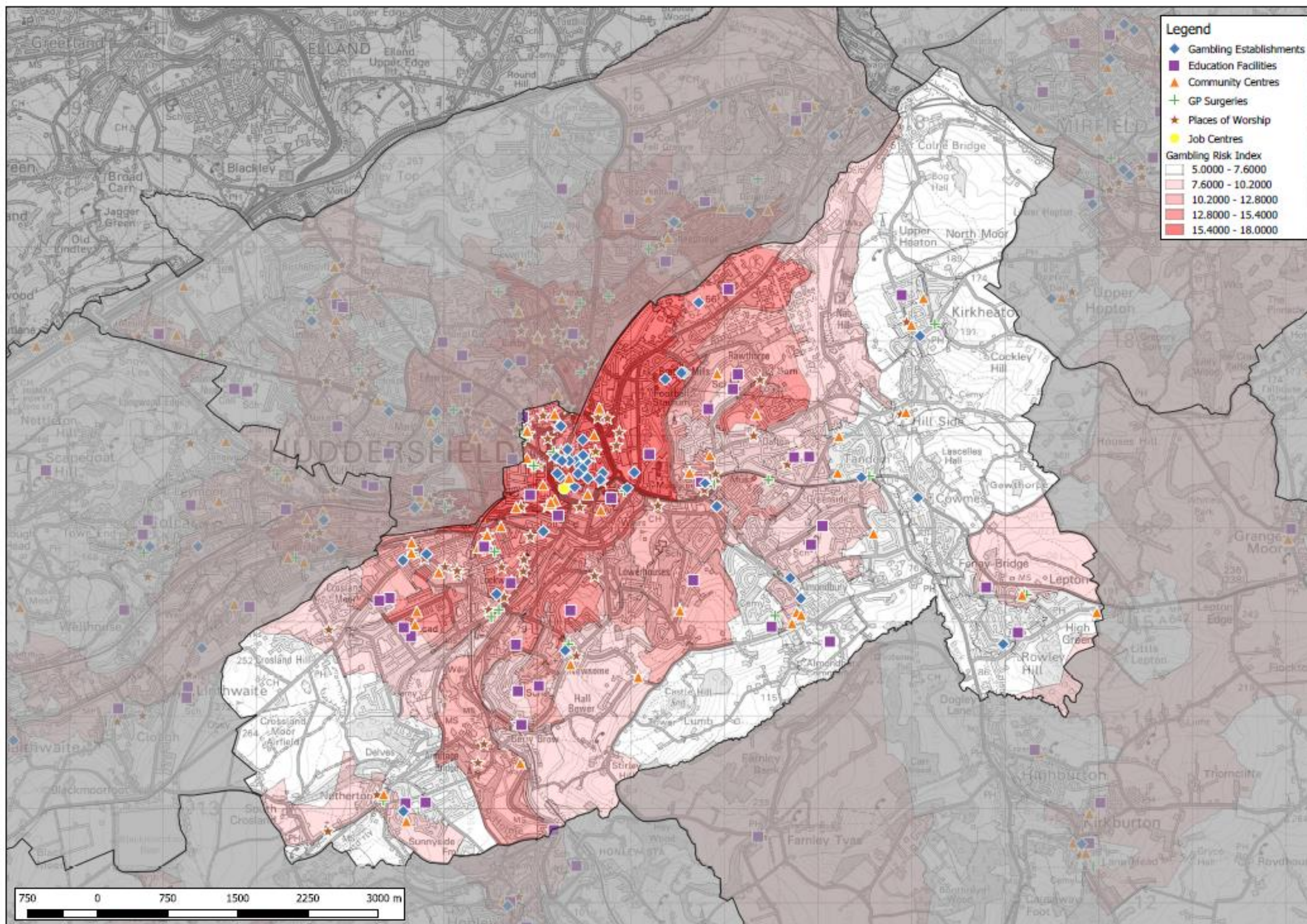
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Gambling Local Area Profile – All Risk Factors Combined - Huddersfield South



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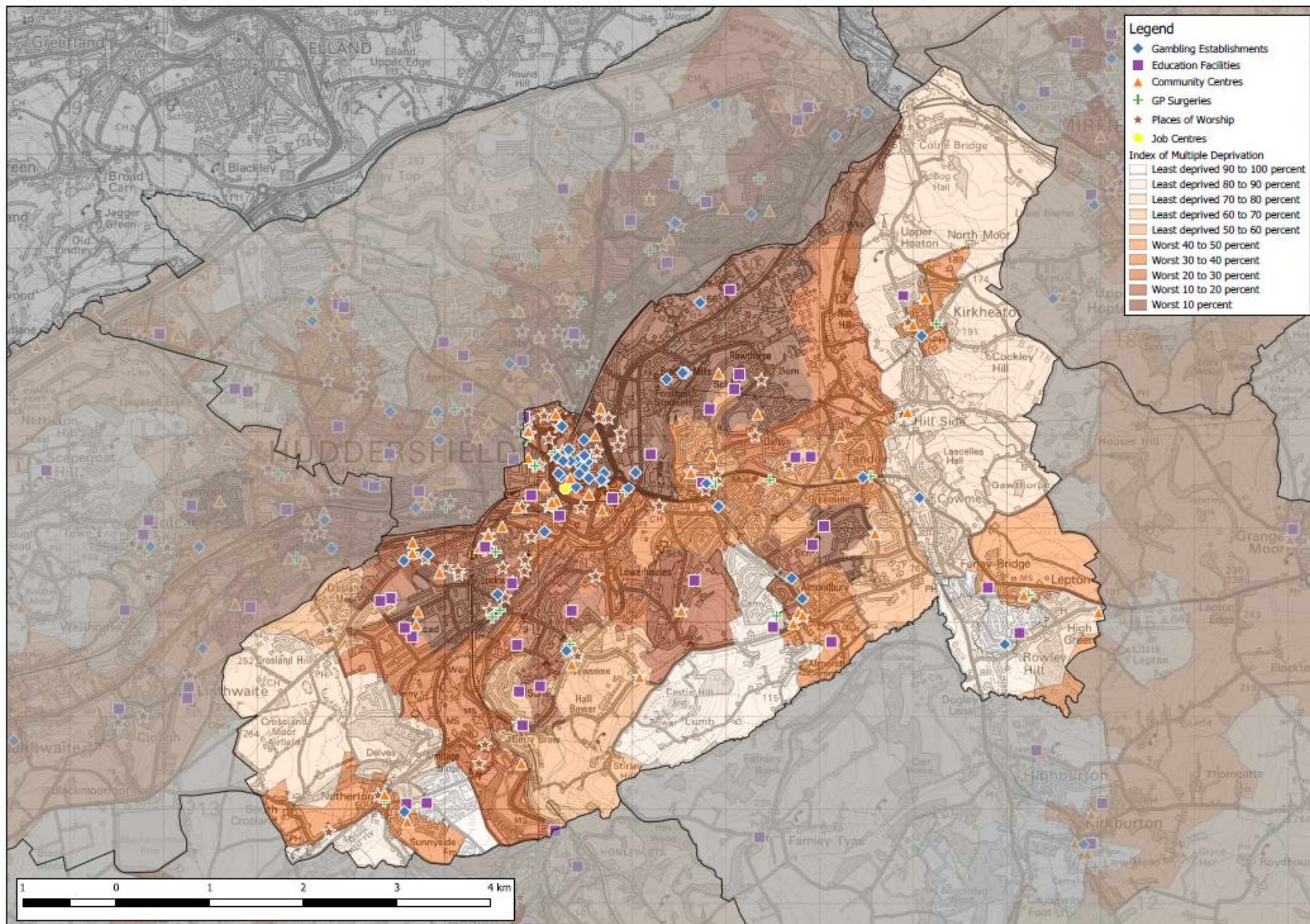
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Huddersfield South



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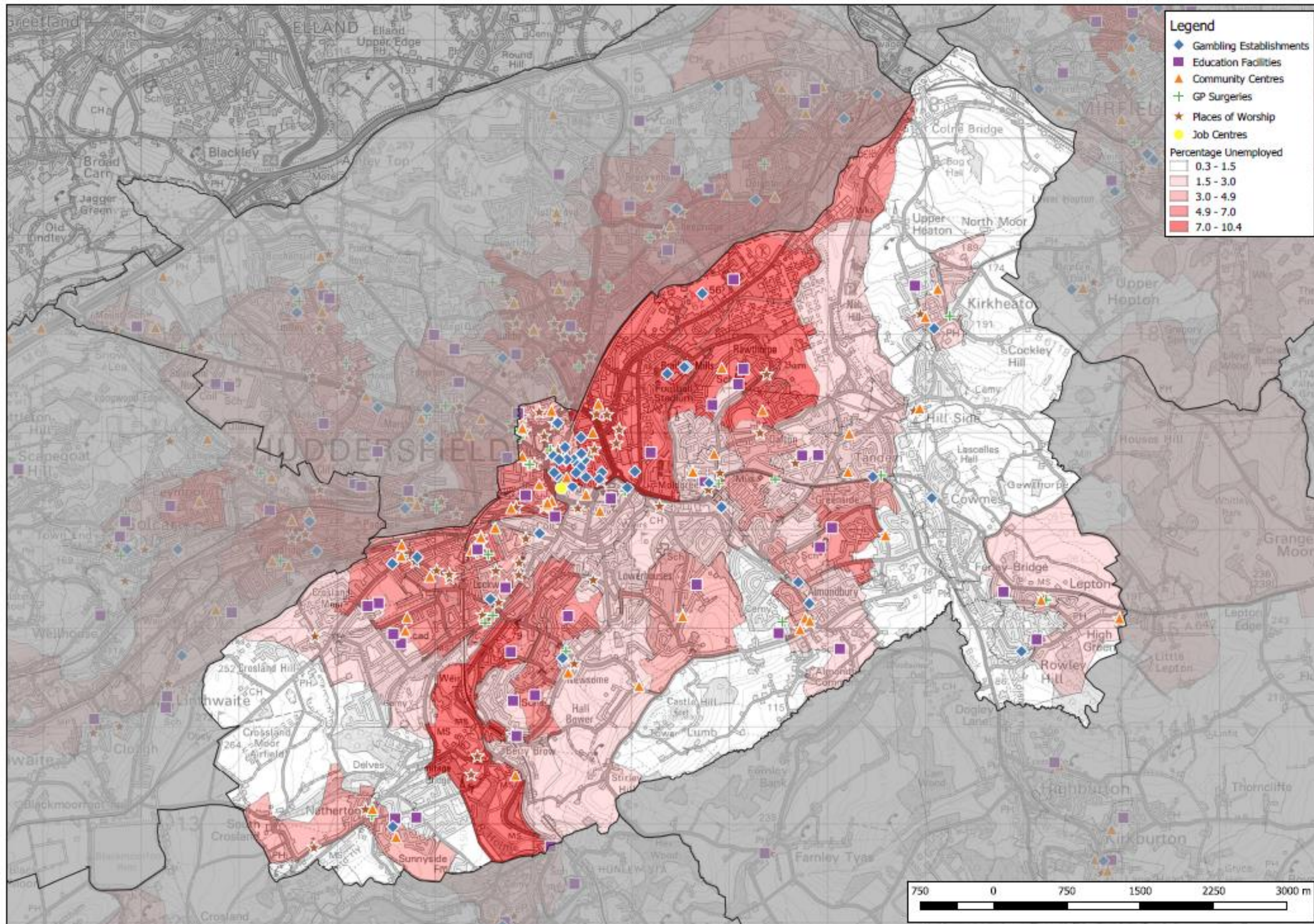
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Gambling Local Area Profile - Percentage Unemployment - Huddersfield South



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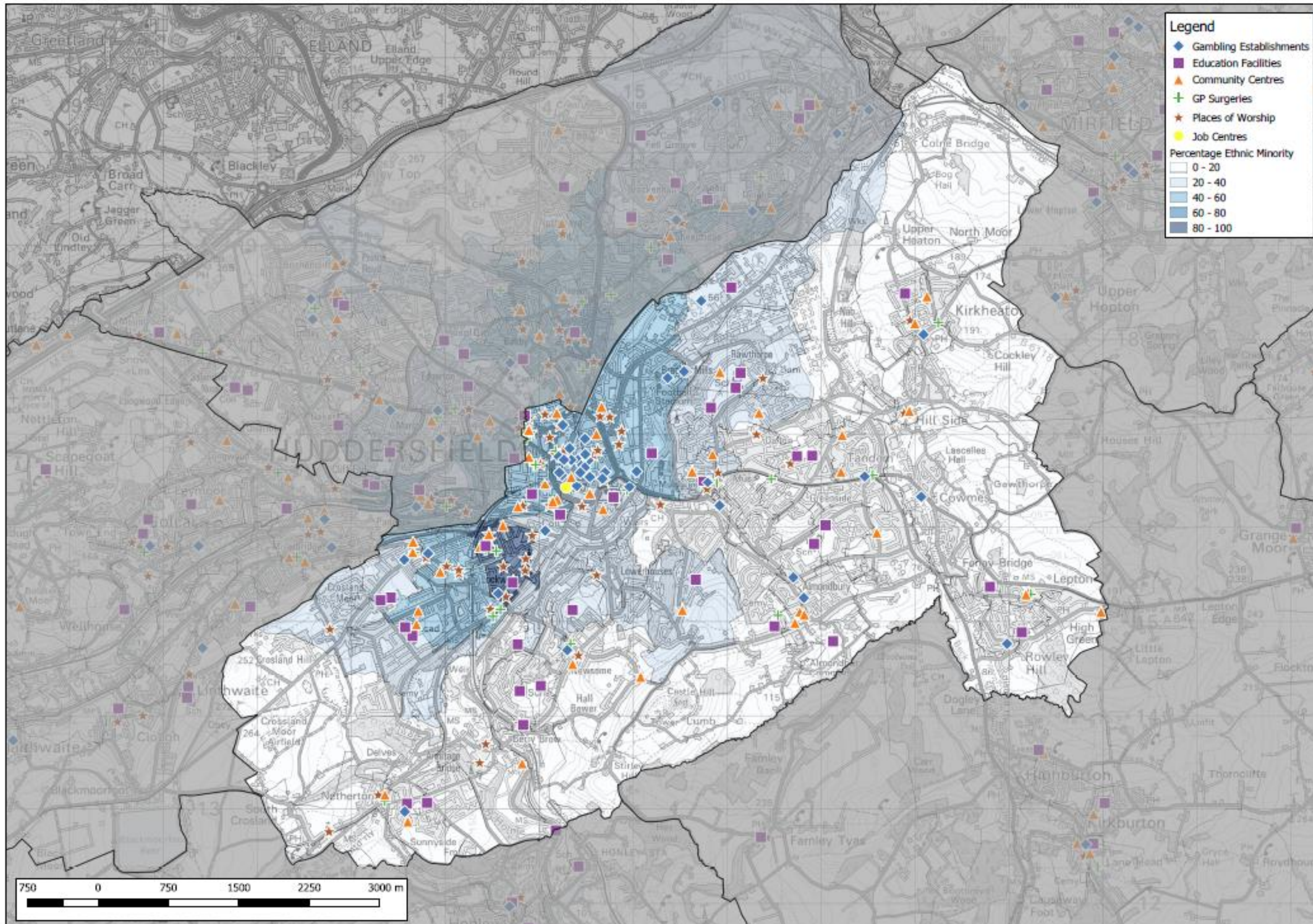
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Gambling Local Area Profile - Percentage Ethnic Minorities - Huddersfield South



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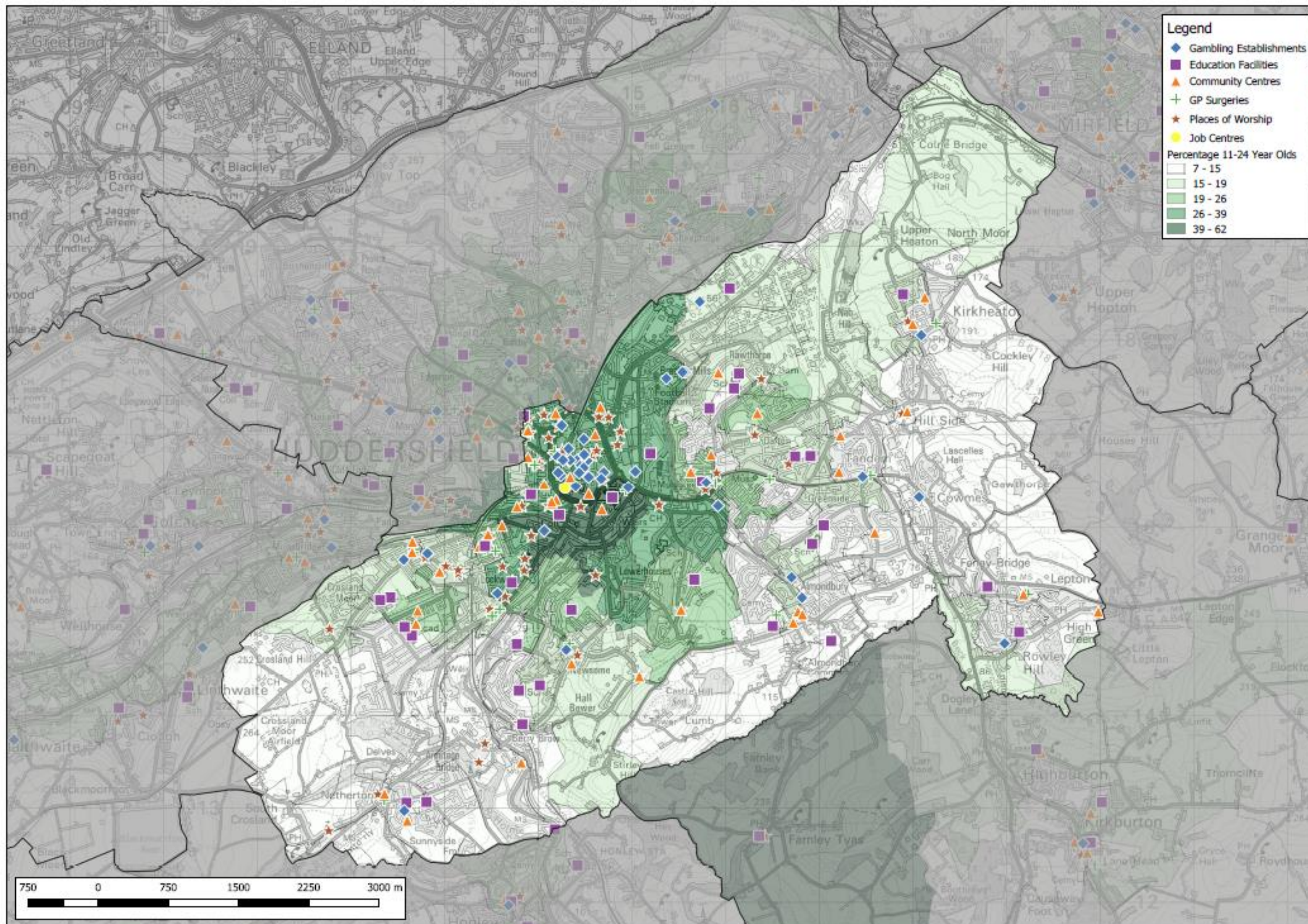
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Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Huddersfield South



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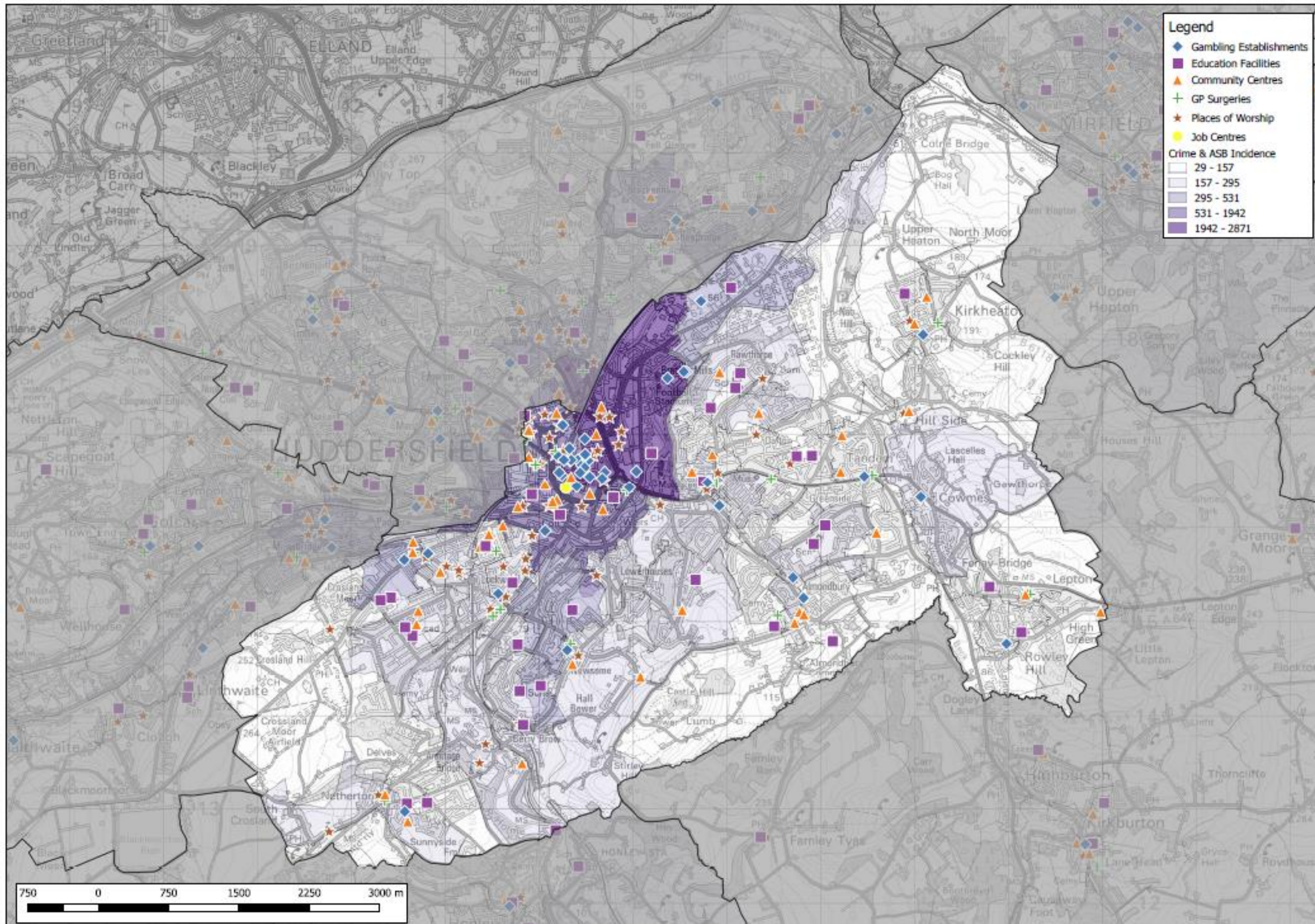
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Huddersfield South



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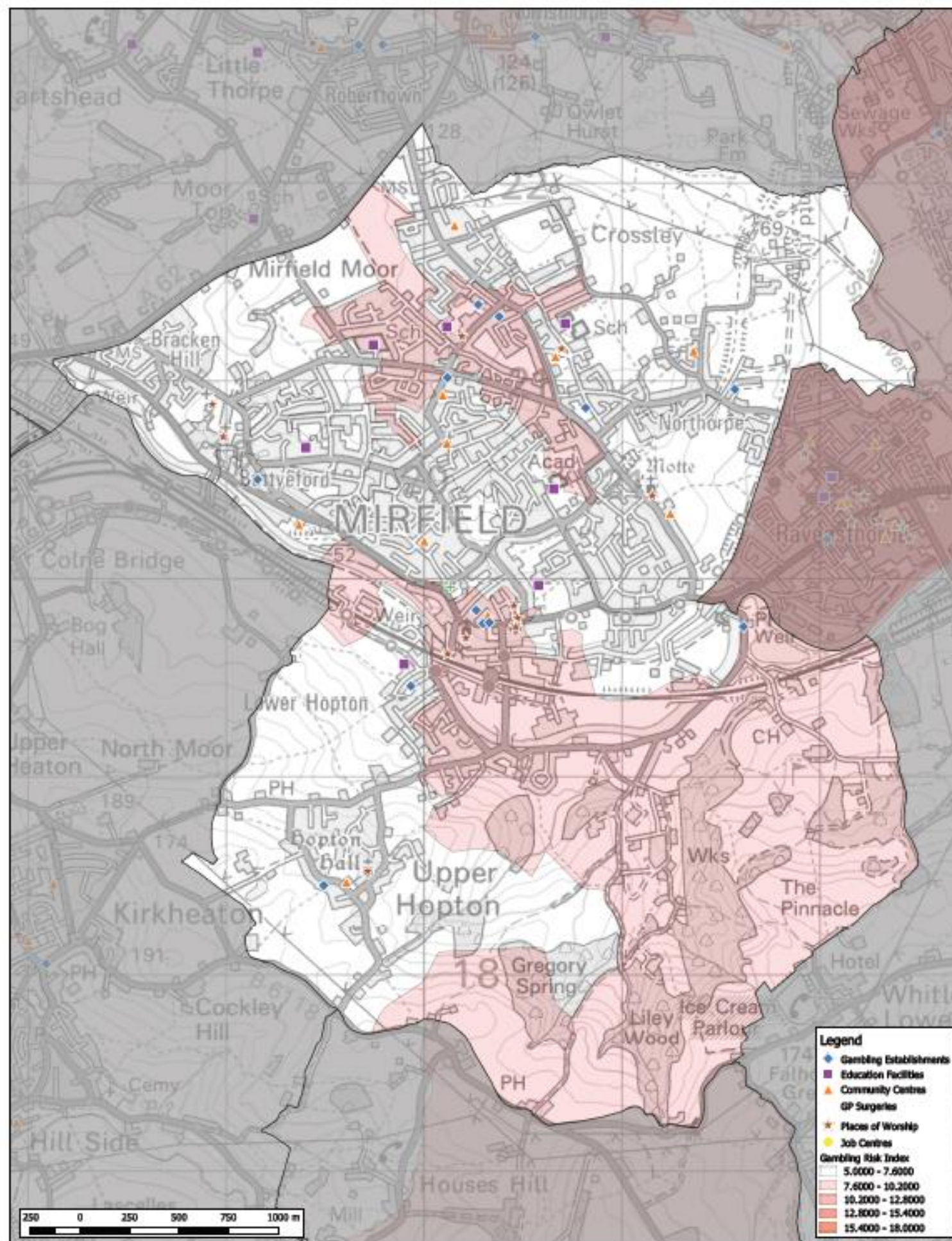
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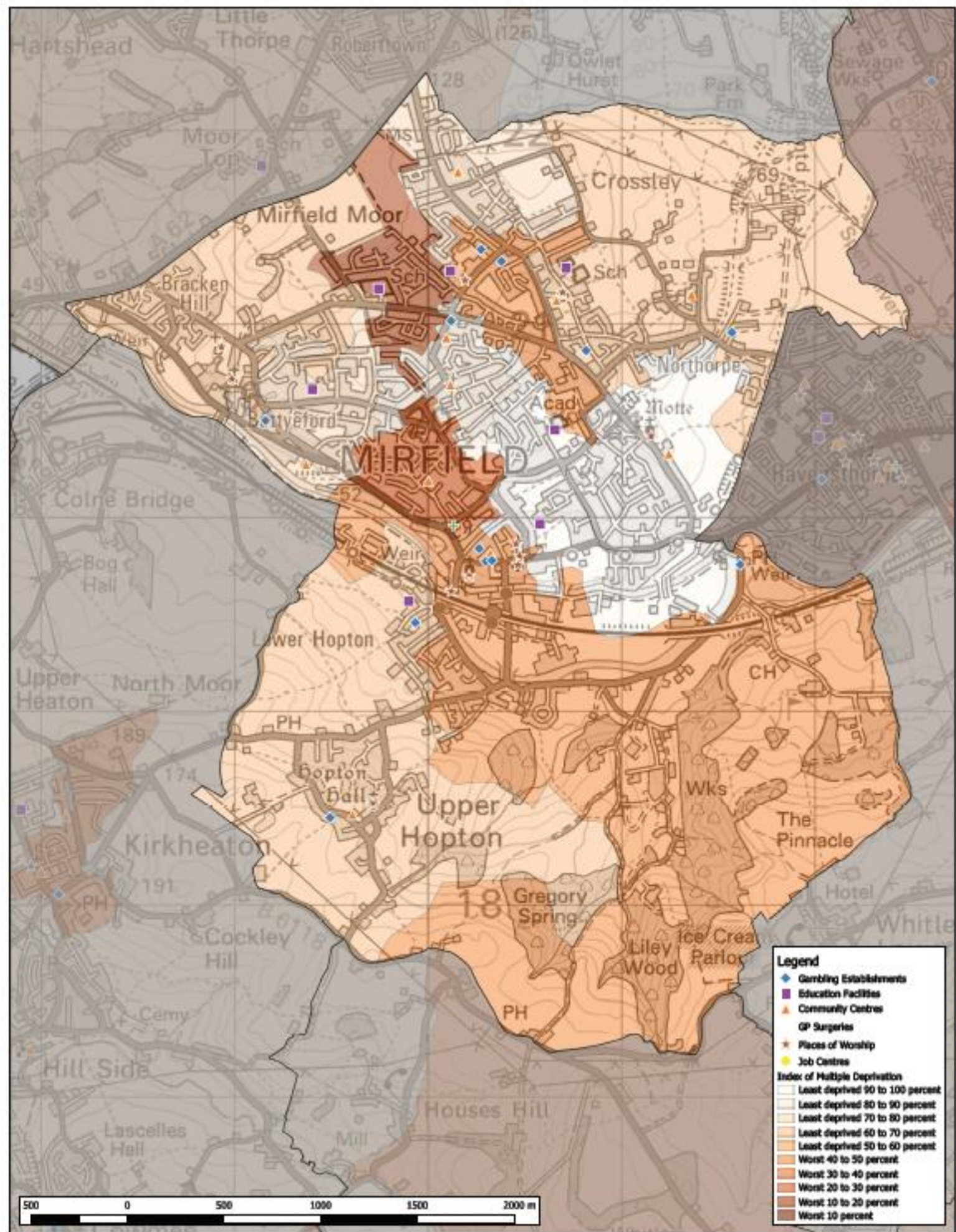
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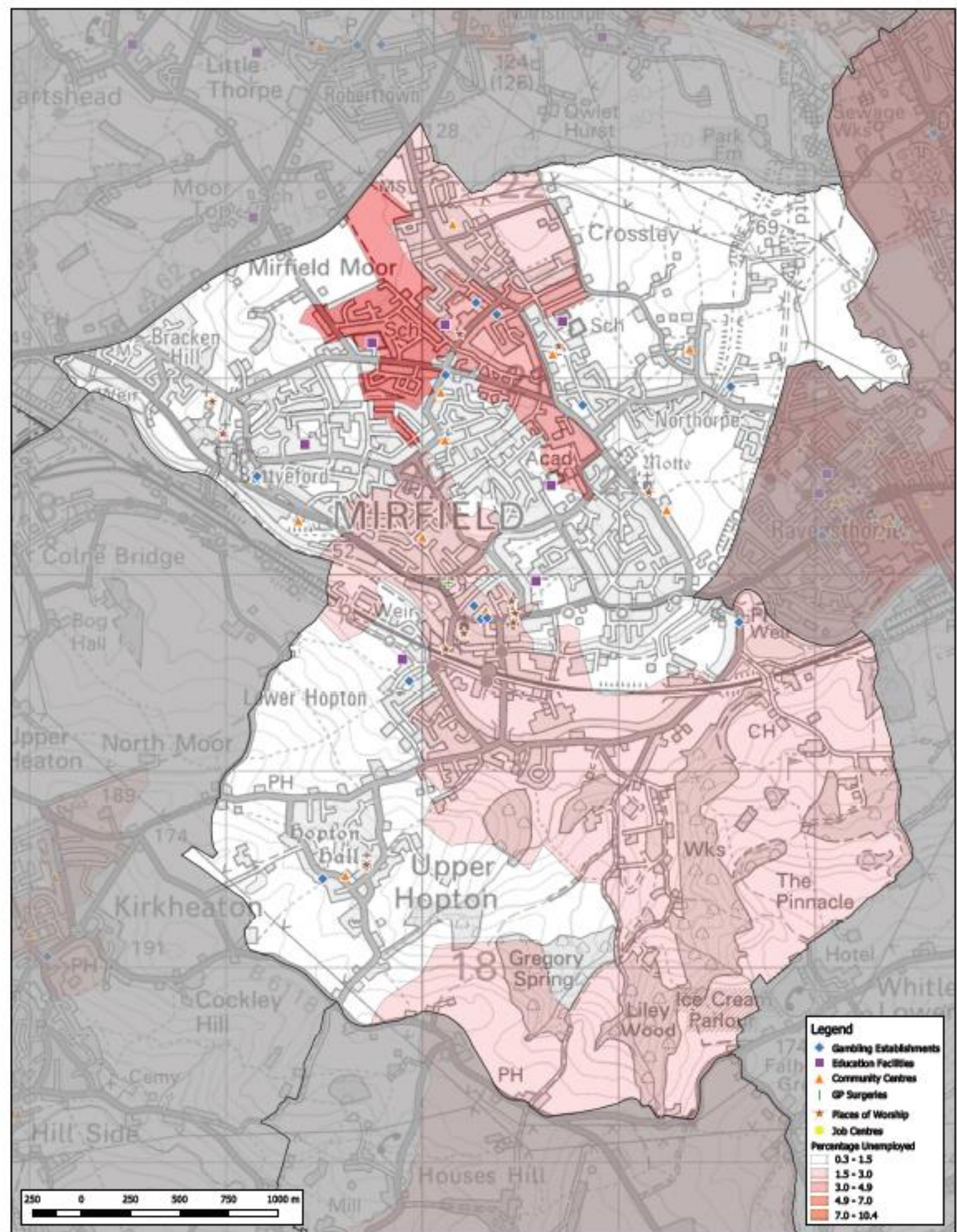
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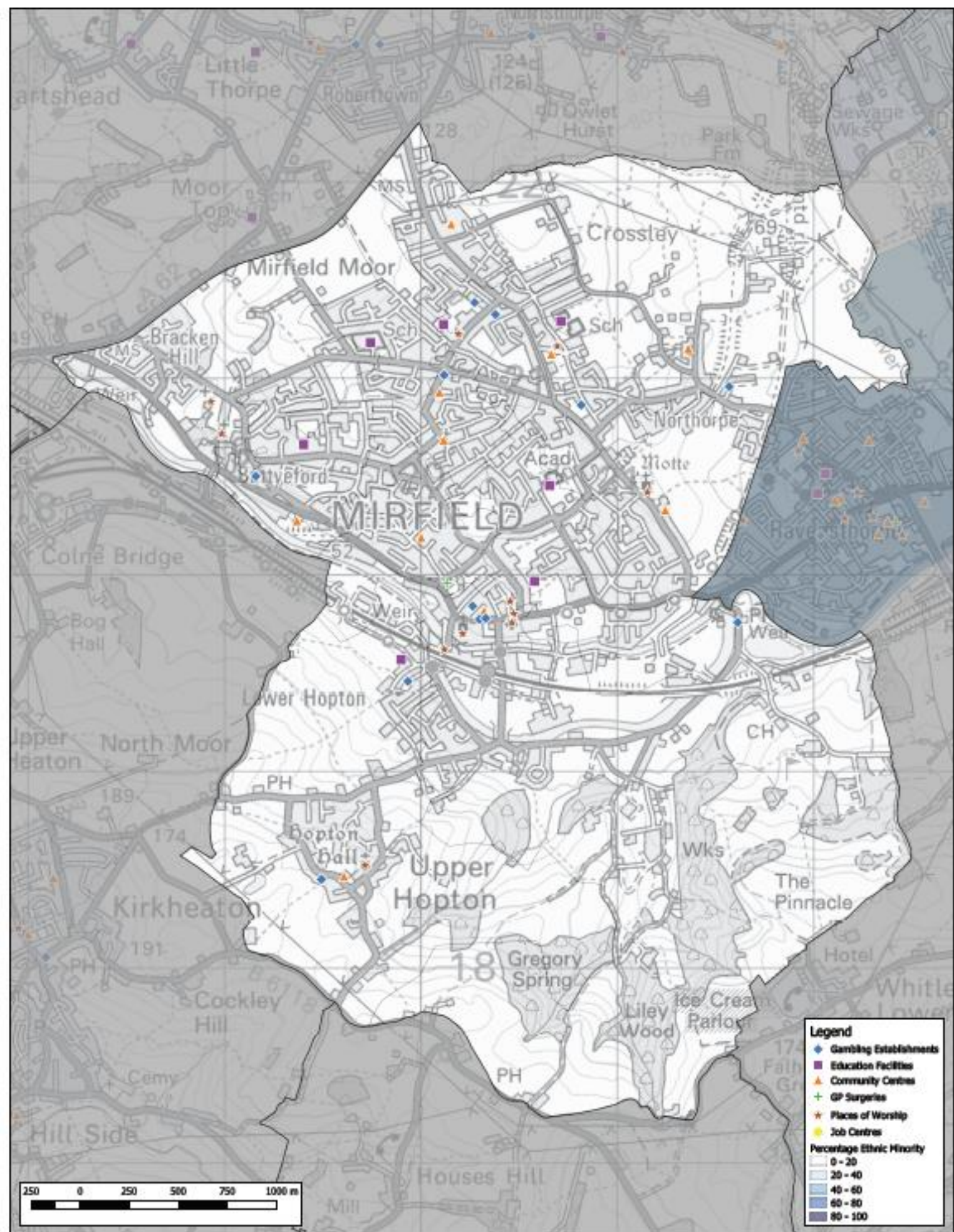
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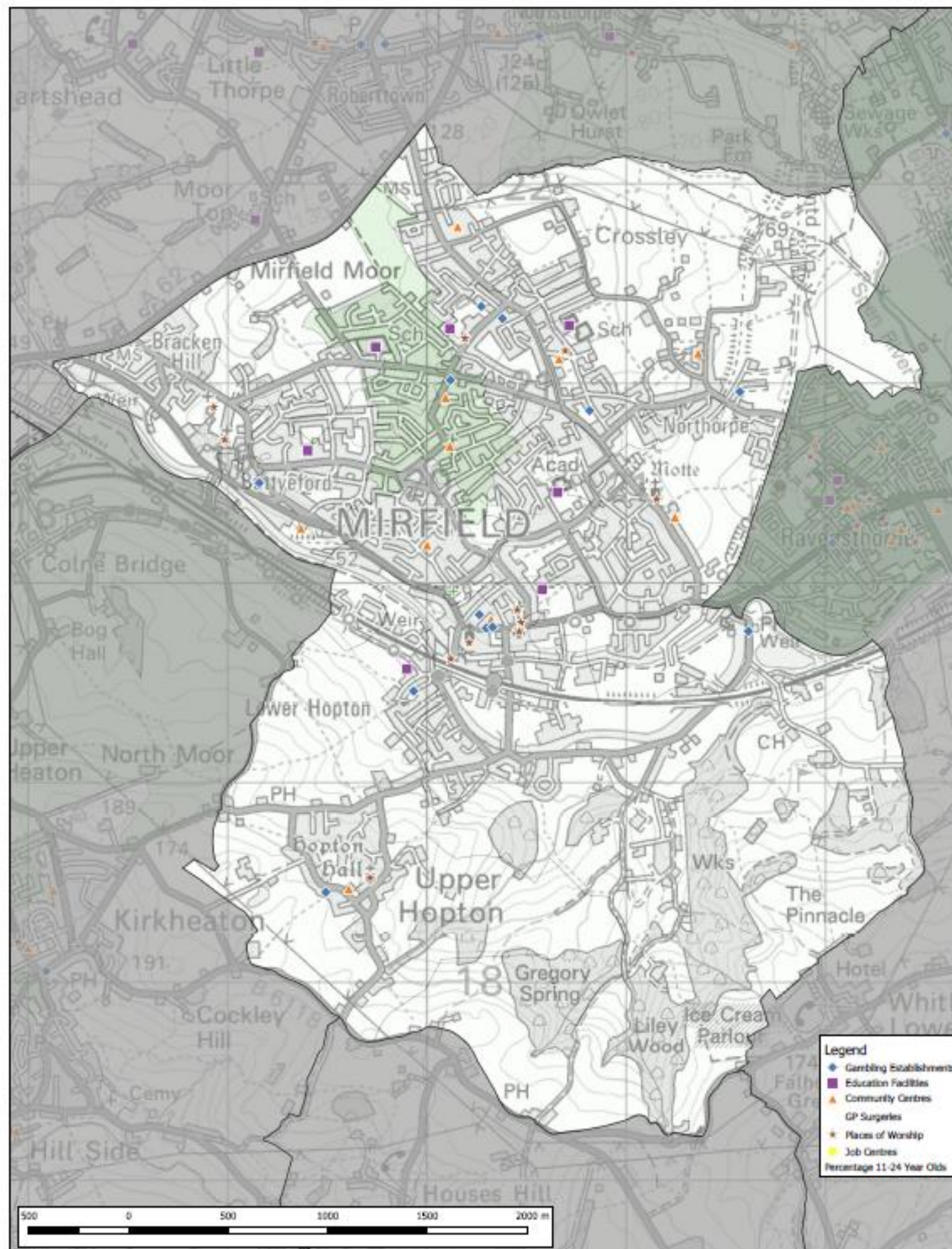


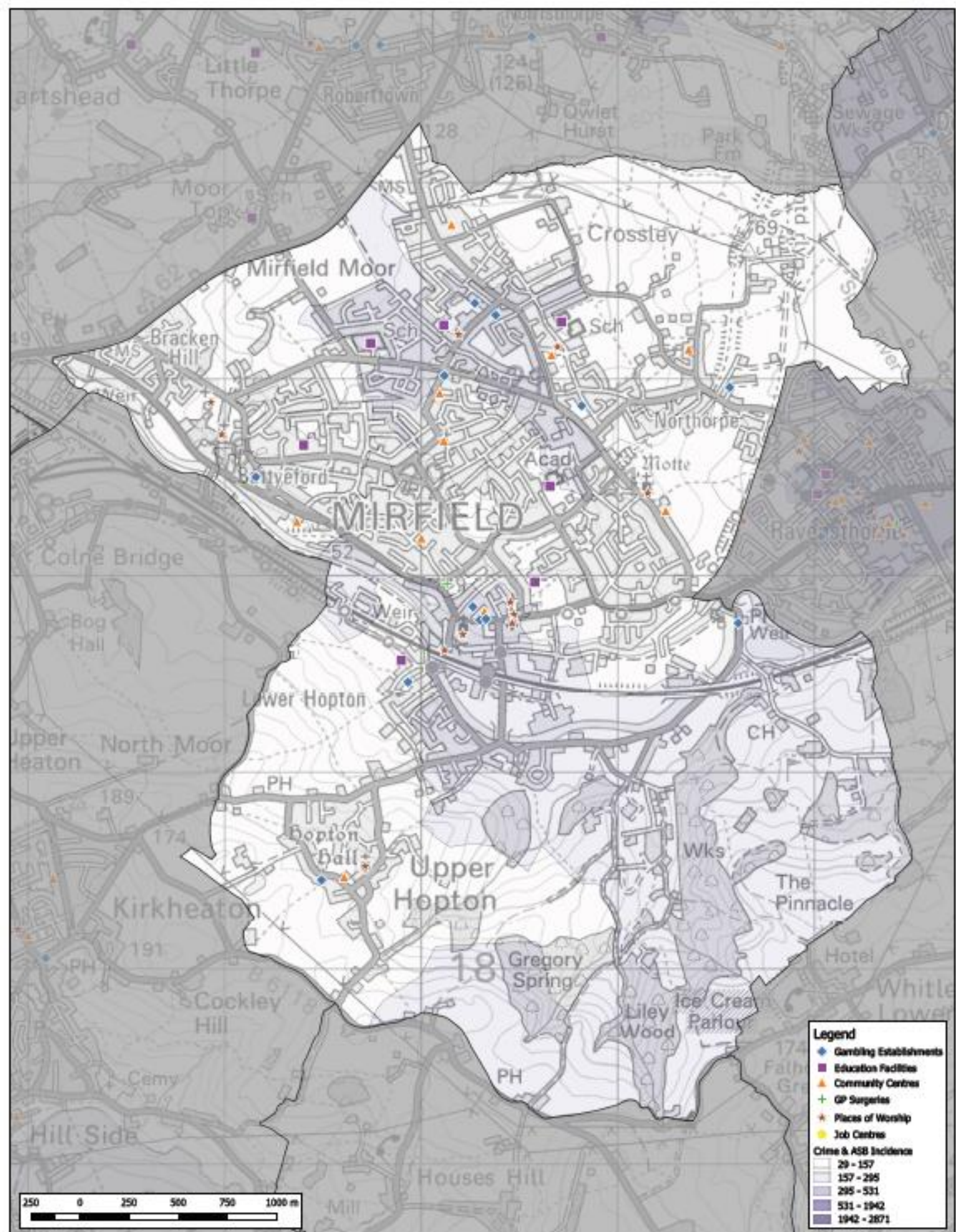




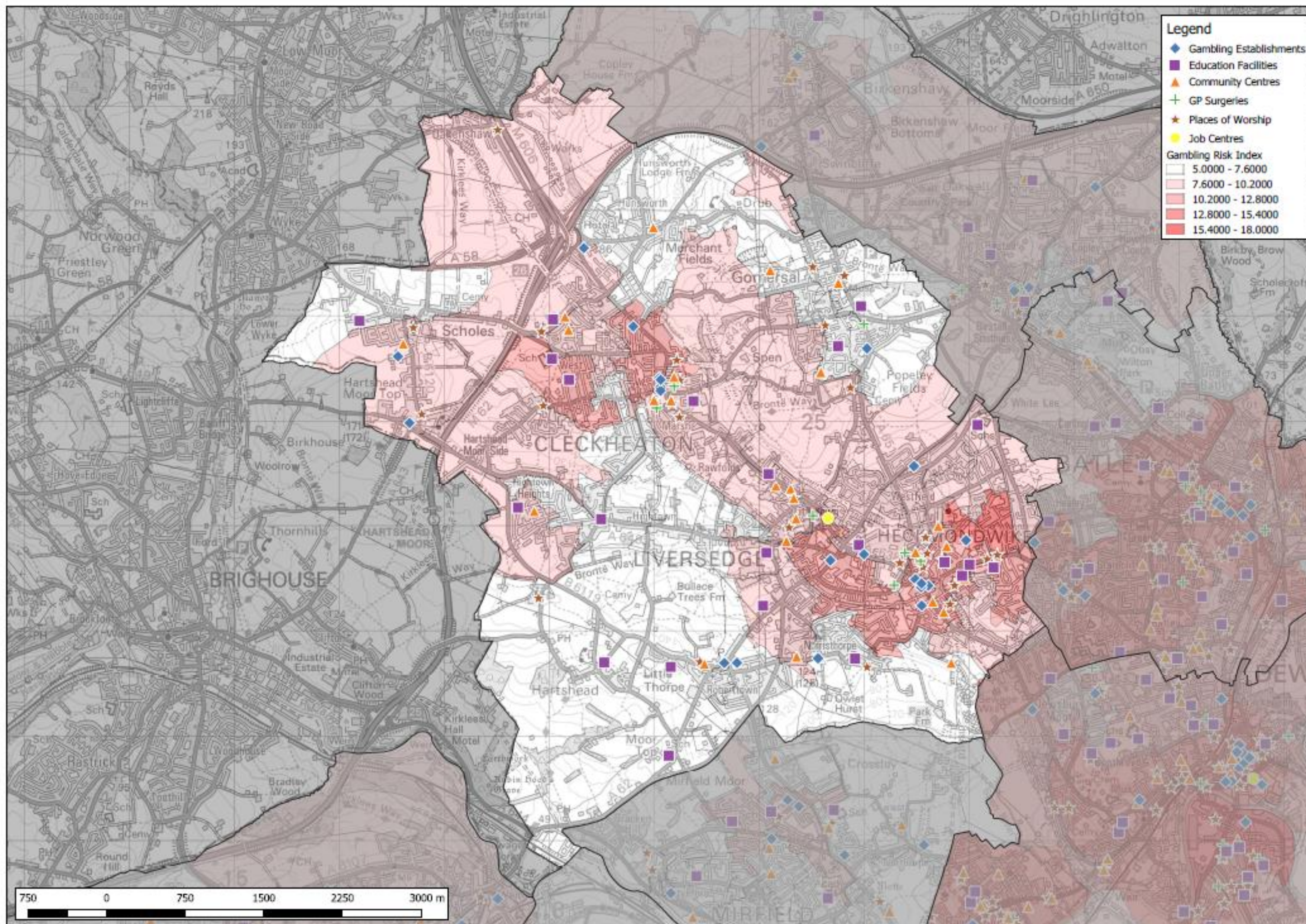








Gambling Local Area Profile – All Risk Factors Combined - Spen



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Intelligence**

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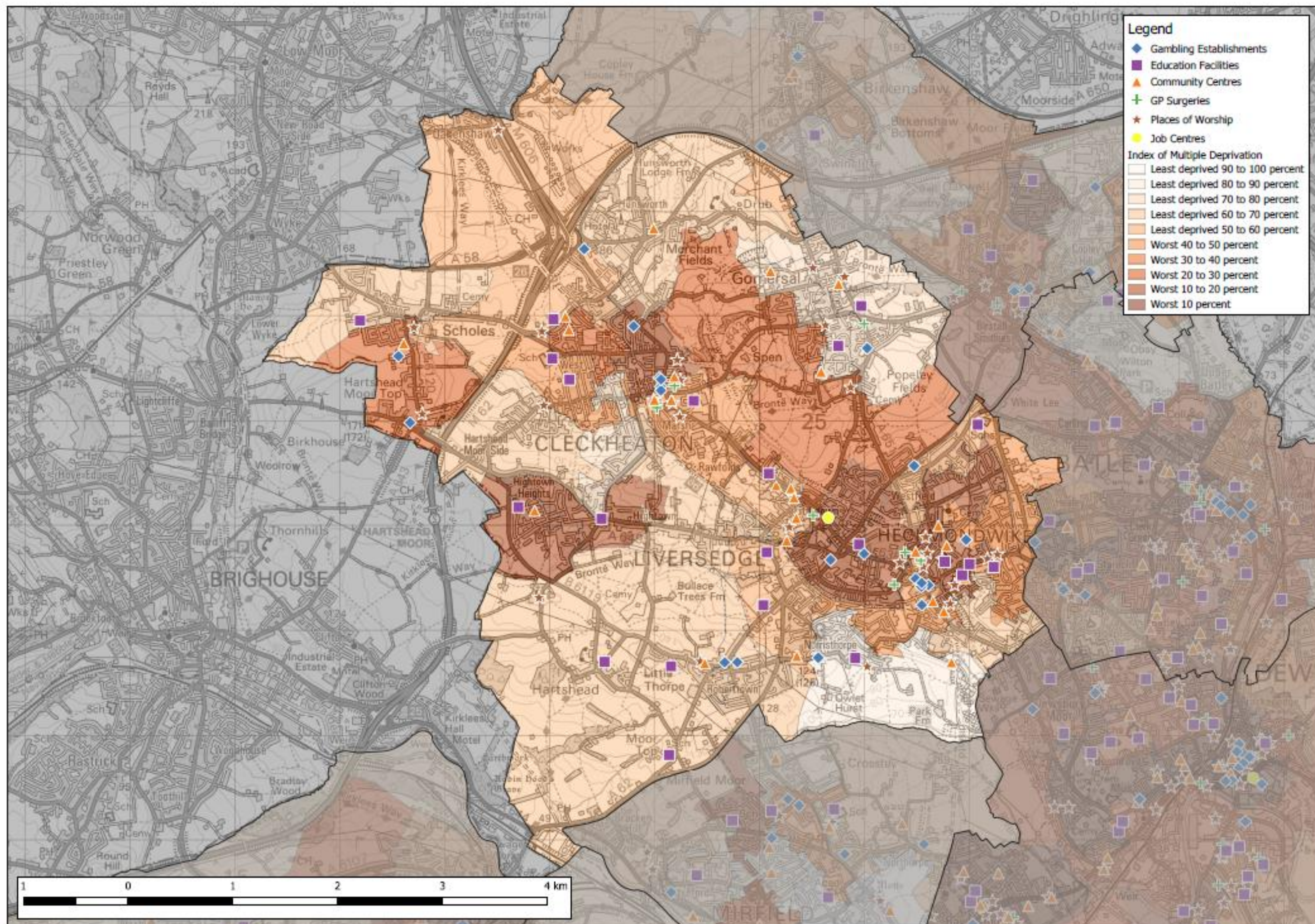
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Gambling Local Area Profile - Index of Multiple Deprivation (2015) - Spen



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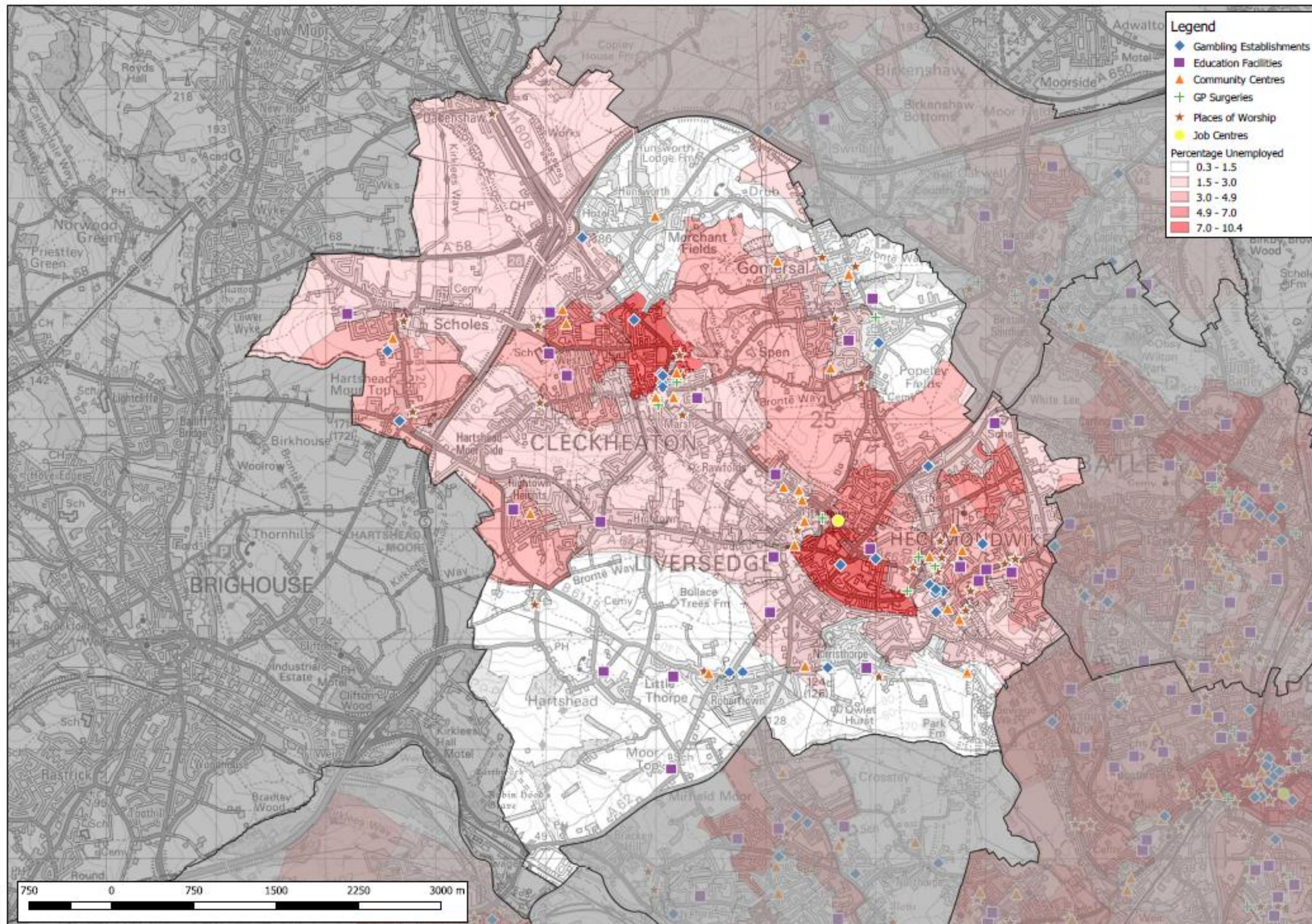
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Gambling Local Area Profile - Percentage Unemployment - Spen



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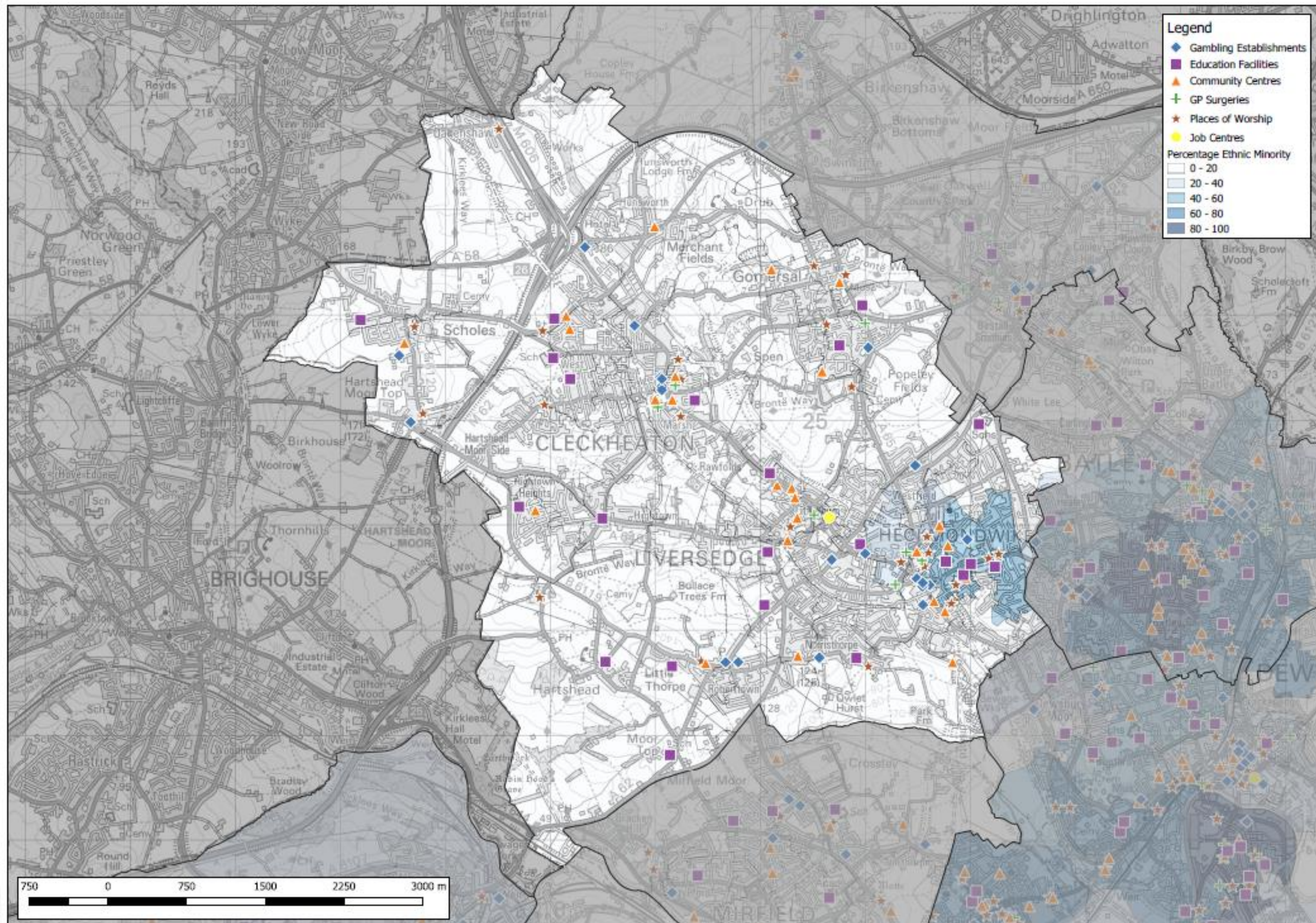
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Gambling Local Area Profile - Percentage Ethnic Minorities - Spen



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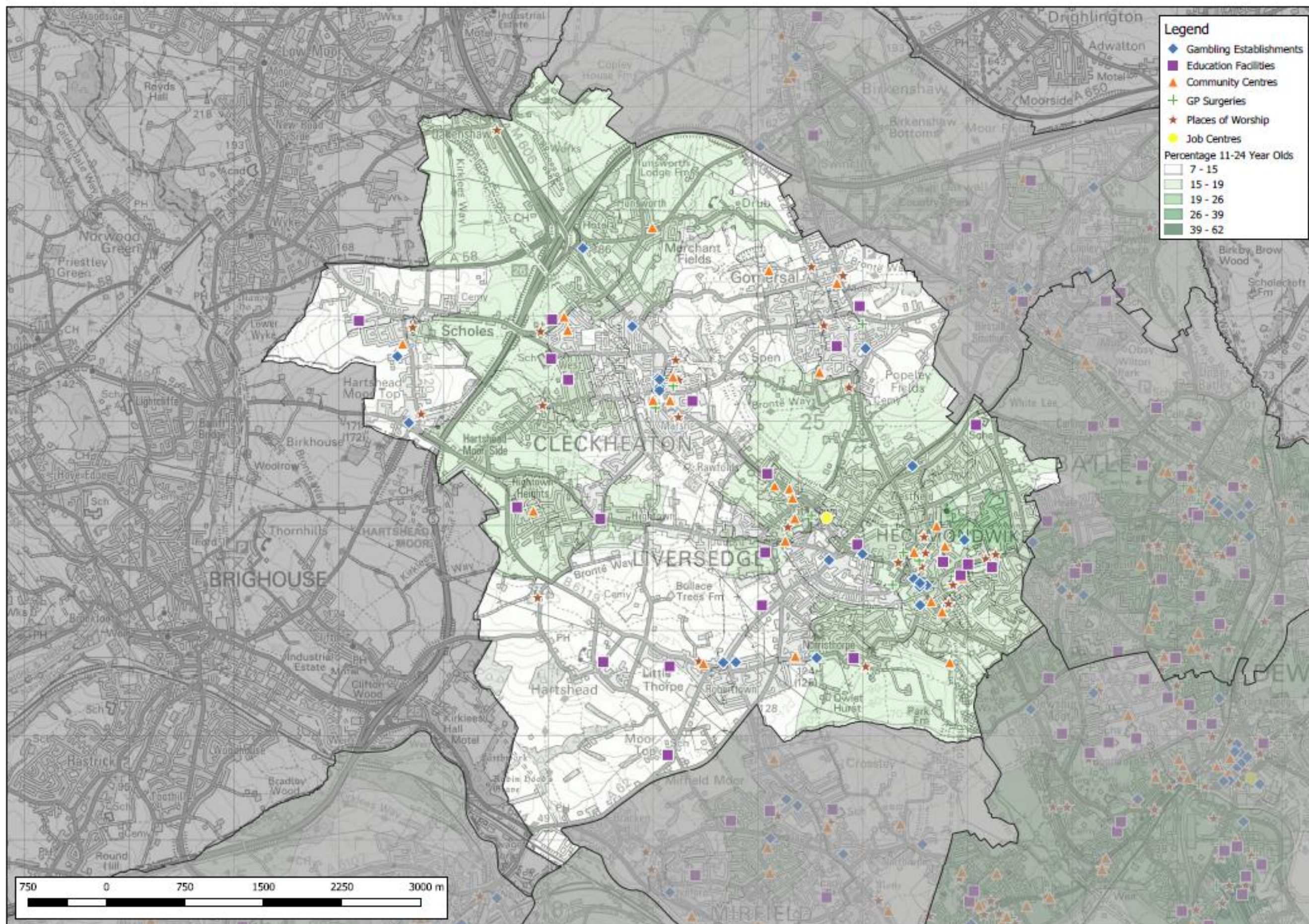
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Gambling Local Area Profile - Percentage 11 to 24 Year Olds - Spen



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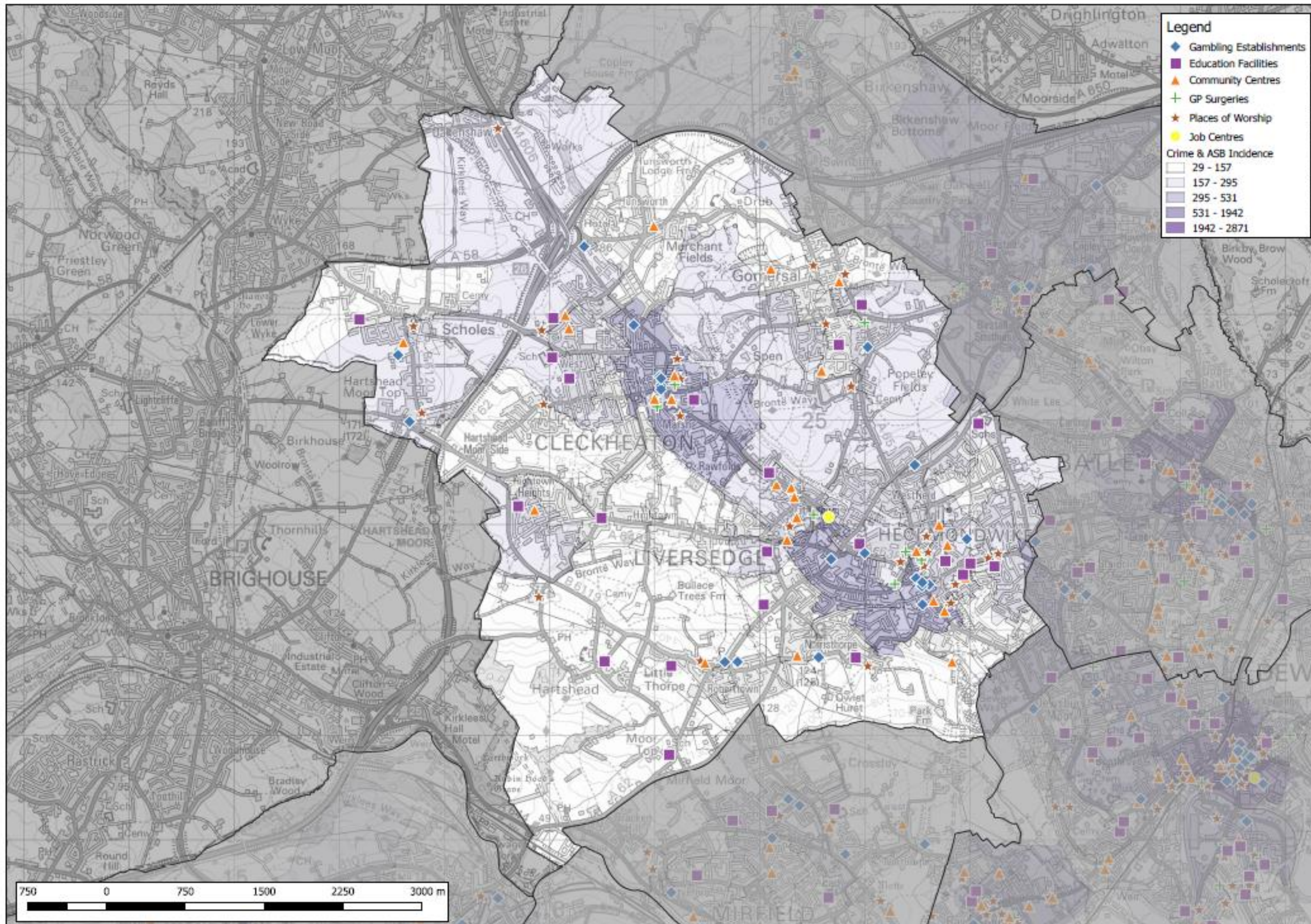
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Gambling Local Area Profile - Crime & Antisocial Behaviour Incidence - Spen



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