

# APPLICATION FOR VARIATION OF A PREMISES LICENCE: The Black Bull, Victoria Road, Ruislip

<b>Committee</b>	Licensing Sub-Committee
<b>Officer Contact</b>	Mark McDermott, Residents Services
<b>Papers with report</b>	<b>Appendix 1</b> - Application to vary a premises licence <b>Appendix 2</b> - Proposed Plans <b>Appendix 3</b> - Current Premises Licence <b>Appendix 4</b> - Current Plan <b>Appendix 5</b> - Representations from Responsible Authorities <b>Appendix 6</b> - Map of the area <b>Appendix 7</b> - Photographs
<b>Ward name</b>	<b>South Ruislip</b>

## 1.0 SUMMARY

To consider an application for a variation of a premises licence in respect of **The Black Bull, Victoria Road, Ruislip HA4 0EF** with representations received from **three Responsible Authorities**.

## 2.0 RECOMMENDATION

To grant the variation with the imposition of the 3 conditions as requested by the Licensing Authority to ensure the licensing objectives are upheld:

- 1) **No customers shall be allowed to use any external area of the premises after 21.00 hours Sunday to Thursday and 22.00 hours Friday and Saturday except for customers permitted to use the area for smoking. No drinks shall be taken into the external area after these hours.**
- 2) **A minimum of 2 Door Supervisors shall be on duty at the premises between 21.00hours until 30 minutes after closing on Fridays, Saturdays and days where non-standard timings are permitted.**
- 3) **A noise limiter shall be installed to ensure that noise from live performances and DJ sets do not cause a nuisance to nearby residents.**

## 3.0 APPLICATION

The premises licence variation application has been submitted by Flint Bishop Solicitors on behalf of the licence holder Mr Austin Whelan. A copy of the application form is attached as **Appendix 1**. A copy of the variation plan is attached as **Appendix 2**.

The application has been submitted to

1. Amend the licensing plan in accordance with drawing number L01 dated February 2019.
2. Remove all existing Annex 2 conditions and replace with updated conditions.

3. Remove all existing non-standard timings and replace with new non-standard timings.

3.1 Type of application applied for

Variation of Premises Licence

3.2 Description of the premises

The premise is a detached Public House with a single bar, games and dining area. It is situated in a suburban residential area, with a car park to the front and left side. There is a patio and large beer garden to the right and rear of the premises bordering residential properties.

The current premises licence can be found at **Appendix 3**

The current approved plan of the premises can be seen at **Appendix 4**

3.3 Licensable Activities

<u>Activity</u>		<u>Proposed variation to existing licence</u>
Sale of alcohol	On and Off Supplies	none
Provision of Late Night Refreshment	indoors	none
Performance of live music	indoors	none
Playing of recorded music	indoors	none

3.4 Licensable Activity Hours

	<u>Current</u> hours for Alcohol	<u>Proposed</u> hours for Alcohol
<b>Monday</b>	11:00 to 00:00	No change
<b>Tuesday</b>	11:00 to 00:00	No change
<b>Wednesday</b>	11:00 to 00:00	No change
<b>Thursday</b>	11:00 to 00:00	No change
<b>Friday</b>	11:00 to 01:00	No change
<b>Saturday</b>	11:00 to 01:00	No change
<b>Sunday</b>	12:00 to 00:00	No change

	<u>Current additional non standard timings</u> hours for Alcohol	<u>Proposed non standard timings</u> hours for Alcohol
	<p>Between 11.00 hours and 00.00 hours on Sundays of any Bank Holiday weekend (including Easter), New Year's Day and Boxing Day</p> <p>Between 11.00 hours and 01.00 hours the following day on Christmas Eve</p> <p>Between 11.00 hours and 02.00 hours on New Year's Eve</p>	<ul style="list-style-type: none"> <li>• An additional 1 hour to the terminal hour on New Year's Day, St Patricks Day, Bank Holiday Sundays, Christmas Eve and Boxing Day.</li> <li>• New Year's Eve - From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.</li> </ul>

	<u>Current</u> hours for Regulated Entertainment	<u>Proposed</u> terminal hours for Regulated Entertainment
<b>Monday</b>	19:00 to 00:00	No change
<b>Tuesday</b>		
<b>Wednesday</b>	19:00 to 00:00	No change
<b>Thursday</b>		
<b>Friday</b>	19:00 to 01:00	No change
<b>Saturday</b>	19:00 to 01:00	No change
<b>Sunday</b>		

	<u>Current Additional non standard timings</u> current hours for Regulated Entertainment	<u>Proposed additional non standard timings</u> hours for Regulated Entertainment
		<ul style="list-style-type: none"> <li>• An additional 1 hour to the terminal hour on New Year's Day, St Patricks Day, Bank Holiday Sundays, Christmas Eve and Boxing Day.</li> <li>• New Year's Eve - From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.</li> </ul>

### 3.5 Opening Hours

	<u>Current</u> hours	<u>Proposed</u> terminal hours for premises licence
<b>Monday</b>	11:00 to 00:30	No change
<b>Tuesday</b>	11:00 to 00:30	No change
<b>Wednesday</b>	11:00 to 00:30	No change
<b>Thursday</b>	11:00 to 00:30	No change
<b>Friday</b>	11:00 to 01:30	No change
<b>Saturday</b>	11:00 to 01:30	No change
<b>Sunday</b>	12:00 to 00:00	No change

	<u>Current Additional non standard timings</u> hours for Regulated Entertainment	<u>Proposed additional non standard timings</u> hours for Regulated Entertainment
	<p>Between 11.00 hours and 00.30 hours on Sundays of any Bank Holiday weekend(including Easter), New Year's Day and Boxing Day.</p> <p>Between 11.00 hours and 01.30 hours the following day on Christmas Eve.</p> <p>Between 11.00 hours and 02.30 hours on New Year's Eve</p>	<ul style="list-style-type: none"> <li>• An additional 1 hour to the terminal hour on New Year's Day, St Patricks Day, Bank Holiday Sundays, Christmas Eve and Boxing Day.</li> <li>• New Year's Eve - From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.</li> </ul>

### 3.6 Operating Schedule and Conditions

The variation seeks to remove all existing annex 2 conditions (see **Appendix 3**) and replace with the following proposed conditions:

1. The premises shall install and maintain a comprehensive CCTV system. All entry and exit points will be covered enabling frontal identification of every person entering. The CCTV system shall continually record whilst the premises are open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum of 28 days with date and time stamping. Viewing of recordings shall be made available on request of Police or authorised officer throughout the entire 28 day period.
2. A record shall be kept detailing all refused sales of alcohol. The record should include date and time of the refused sale and the name of the member of staff who refused the sale The

record shall be made available to for inspection at the premises by the Police and trading standards at all times whilst the premises are open.

3. An incident log shall be maintained at the premises and details of all known incidents recorded within the log.
4. The need for door supervisors shall be assessed by way of a risk assessment carried out by the Designated Premises Supervisor and cognisance will be taken of any Police advice.
5. Where SIA registered door supervisors are used at the premises, a record must kept of their SIA registration number and the dates and times when they are on duty.
6. Notices shall be prominently displayed at all public exits and in the external requesting customers to respect the needs of local residents and leave the premises and area quietly.
7. No customers shall be allowed to use any external area of the premises after 23.00 on Sunday to Thursday and midnight on Friday and Saturday, except for customer permitted to temporarily leave the premises to smoke and no drinks shall be permitted to be taken into any external area after these times.
8. Children under the age of 18 must be accompanied by an adult over the age of 18 at all times whilst on the premises and must be off the premises by 23.00, unless attending a private function or on New Year's Eve.
9. A challenge 21 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS hologram.

#### **4.0 CONSULTATION**

4.1 Closing date for representations  
18<sup>th</sup> April 2019

4.2 Public Notice published in local newspaper  
27<sup>th</sup> March 2019 - Uxbridge Gazette

#### **5.0 REPRESENTATIONS**

5.1 There are three representations from the Responsible Authorities

Stephanie Waterford <b>Licensing Authority</b>	Prevention of Crime and Disorder Prevention of Public Nuisance	<b>Appendix 5</b>
Adam Stitson <b>Enforcing Authority for Noise Nuisance</b>	Prevention of Public Nuisance	<b>Appendix 5</b>
Police Licensing Officer PC David Butler <b>Metropolitan Police</b>	Prevention of Crime and Disorder	<b>Appendix 5</b>

## 6.0 BACKGROUND INFORMATION

### 6.1 Other licensed premises nearby.

There are not any other licensed Public Houses located in the immediate proximity.

### 6.2 There has been no recorded Members Enquires for this site.

## 7.0 OFFICER'S OBSERVATIONS

### 7.1 Observations

This is an application to vary the existing licence of an established Public House to allow for a refurbishment of the premises including the external garden. Changes to the internal area include the introduction of a raised area and reconfiguration of fixed seating. Initially part of the scheme was to introduce an additional outside bar but this was withdrawn and amended plans were submitted see **Appendix 2**. The application also seeks to remove all existing conditions and replace them with conditions listed at Part M on the application form and remove all existing non-standard timings and replace with new non-standard timings.

### 7.2 Relevant Representations

The relevant representations received mainly raise the following issues:

The Prevention of Crime and Disorder -

- Representations received from Responsible Authorities point out some historical problems with disorder and disturbance at the premises and the need to retain the existing door supervisor condition to combat this
- Representations received from Responsible Authorities refer to the lack of detail in the application to ascertain the proposed style of operation of the premises.

The Prevention of Public Nuisance -

- Representations received from Responsible Authorities refer to the introduction of new seating in the garden leading to a likely increase of patrons creates a potential for increase in nuisance given the closeness of private dwellings to the establishment. The exact extent of this can be seen on the attached map in **Appendix 6**.
- Representations from responsible authorities have concerns over removal of noise limiter condition will increase the likelihood of public nuisance.

## 8.0 Relevant sections of S.182 Guidance

The Guidance issued by the Secretary of State under S182 of the Licensing Act 2003 states:

### **The purpose of the Guidance**

**At paragraph 1.7**, "This Guidance is provided to licensing authorities in relation to the carrying out of their functions under the 2003 Act. It also provides information to magistrates' courts hearing appeals against licensing decisions and has been made widely available for the benefit of those who run licensed premises, their legal advisers and the general public. It

is a key medium for promoting best practice, ensuring consistent application of licensing powers across England and Wales and for promoting fairness, equal treatment and proportionality."

## **Crime and disorder**

**At paragraph 2.1** Licensing authorities should look to the police as the main source of advice on crime and disorder. They should also seek to involve the local Community Safety Partnership (CSP).

**At paragraph 2.2** In the exercise of their functions, licensing authorities should seek to cooperate with the Security Industry Authority ("SIA") as far as possible and consider adding relevant conditions to licences where appropriate. The SIA also plays an important role in preventing crime and disorder by ensuring that door supervisors are properly licensed and, in partnership with police and other agencies, that security companies are not being used as fronts for serious and organised criminal activity. This may include making specific enquiries or visiting premises through intelligence led operations in conjunction with the police, local authorities and other partner agencies. Similarly, the provision of requirements for door supervision may be appropriate to ensure that people who are drunk, drug dealers or people carrying firearms do not enter the premises and ensuring that the police are kept informed.

**At paragraph 2.3** Conditions should be targeted on deterrence and preventing crime and disorder including the prevention of illegal working in licensed premises (see paragraph 10.10). For example, where there is good reason to suppose that disorder may take place, the presence of closed-circuit television (CCTV) cameras both inside and immediately outside the premises can actively deter disorder, nuisance, anti-social behaviour and crime generally. Some licence holders may wish to have cameras on their premises for the prevention of crime directed against the business itself, its staff, or its customers. But any condition may require a broader approach, and it may be appropriate to ensure that the precise location of cameras is set out on plans to ensure that certain areas are properly covered and there is no subsequent dispute over the terms of the condition.

## **Public nuisance**

**At paragraph 2.15** The 2003 Act enables licensing authorities and responsible authorities, through representations, to consider what constitutes public nuisance and what is appropriate to prevent it in terms of conditions attached to specific premises licences and club premises certificates. It is therefore important that in considering the promotion of this licensing objective, licensing authorities and responsible authorities focus on the effect of the licensable activities at the specific premises on persons living and working (including those carrying on business) in the area around the premises which may be disproportionate and unreasonable. The issues will mainly concern noise nuisance, light pollution, noxious smells and litter.

**At paragraph 2.16** Public nuisance is given a statutory meaning in many pieces of legislation. It is however not narrowly defined in the 2003 Act and retains its broad common law meaning. It may include in appropriate circumstances the reduction of the living and working amenity and environment of other persons living and working in the area of the licensed premises. Public nuisance may also arise as a result of the adverse effects of artificial light, dust, odour and insects or where its effect is prejudicial to health.

**At paragraph 2.17** Conditions relating to noise nuisance will usually concern steps appropriate to control the levels of noise emanating from premises. This might be achieved by a simple measure such as ensuring that doors and windows are kept closed after a

particular time, or persons are not permitted in garden areas of the premises after a certain time. More sophisticated measures like the installation of acoustic curtains or rubber speaker mounts to mitigate sound escape from the premises may be appropriate. However, conditions in relation to live or recorded music may not be enforceable in circumstances where the entertainment activity itself is not licensable (see chapter 16). Any conditions appropriate to promote the prevention of public nuisance should be tailored to the type, nature and characteristics of the specific premises and its licensable activities. Licensing authorities should avoid inappropriate or disproportionate measures that could deter events that are valuable to the community, such as live music. Noise limiters, for example, are expensive to purchase and install and are likely to be a considerable burden for smaller venues.

**At paragraph 2.18** As with all conditions, those relating to noise nuisance may not be appropriate in certain circumstances where provisions in other legislation adequately protect those living in the area of the premises. But as stated earlier in this Guidance, the approach of licensing authorities and responsible authorities should be one of prevention and when the powers are engaged, licensing authorities should be aware of the fact that other legislation may not adequately cover concerns raised in relevant representations and additional conditions may be appropriate.

**At paragraph 2.19** Where applications have given rise to representations, any appropriate conditions should normally focus on the most sensitive periods. For example, the most sensitive period for people being disturbed by unreasonably loud music is at night and into the early morning when residents in adjacent properties may be attempting to go to sleep or are sleeping. This is why there is still a need for a licence for performances of live music between 11pm and 8am. In certain circumstances, conditions relating to noise emanating from the premises may also be appropriate to address any disturbance as customers enter and leave.

**At paragraph 2.20** Measures to control light pollution will also require careful thought. Bright lighting outside premises which is considered appropriate to prevent crime and disorder may itself give rise to light pollution for some neighbours. Applicants, licensing authorities and responsible authorities will need to balance these issues.

**At paragraph 2.21** Beyond the immediate area surrounding the premises, these are matters for the personal responsibility of individuals under the law. An individual who engages in anti-social behaviour is accountable in their own right. However, it would be perfectly reasonable for a licensing authority to impose a condition, following relevant representations, that requires the licence holder or club to place signs at the exits from the building encouraging patrons to be quiet until they leave the area, or that, if they wish to smoke, to do so at designated places on the premises instead of outside, and to respect the rights of people living nearby to a peaceful night.

### **Determining actions that are appropriate for the promotion of the licensing objectives**

**At paragraph 9.42**, "Licensing authorities are best placed to determine what actions are appropriate for the promotion of the licensing objectives in their areas. All licensing determinations should be considered on a case-by-case basis. They should take into account any representations or objections that have been received from responsible authorities or other persons, and representations made by the applicant or premises user as the case may be."

**At paragraph 9.43,** "The authority's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve."

**At paragraph 9.44** Determination of whether an action or step is appropriate for the promotion of the licensing objectives requires an assessment of what action or step would be suitable to achieve that end. While this does not therefore require a licensing authority to decide that no lesser step will achieve the aim, the authority should aim to consider the potential burden that the condition would impose on the premises licence holder (such as the financial burden due to restrictions on licensable activities) as well as the potential benefit in terms of the promotion of the licensing objectives. However, it is imperative that the authority ensures that the factors which form the basis of its determination are limited to consideration of the promotion of the objectives and nothing outside those parameters. As with the consideration of licence variations, the licensing authority should consider wider issues such as other conditions already in place to mitigate potential negative impact on the promotion of the licensing objectives and the track record of the business. Further advice on determining what is appropriate when imposing conditions on a licence or certificate is provided in Chapter 10. The licensing authority is expected to come to its determination based on an assessment of the evidence on both the risks and benefits either for or against making the determination.

### **Proportionality**

**At paragraph 10.10** it states that "The 2003 Act requires that licensing conditions should be tailored to the size, type, location and characteristics and activities taking place at the premises concerned. Conditions should be determined on a case-by-case basis and standardised conditions which ignore these individual aspects should be avoided. For example, conditions should not be used to implement a general policy in a given area such as the use of CCTV, polycarbonate drinking vessels or identity scanners where they would not be appropriate to the specific premises. Conditions that are considered appropriate for the prevention of illegal working in premises licensed to sell alcohol or late night refreshment might include requiring a premises licence holder to undertake right to work checks on all staff employed at the licensed premises or requiring that a copy of any document checked as part of a right to work check is retained at the licensed premises. Licensing authorities and other responsible authorities should be alive to the indirect costs that can arise because of conditions. These could be a deterrent to holding events that are valuable to the community or for the funding of good and important causes. Licensing authorities should therefore ensure that any conditions they impose are only those which are appropriate for the promotion of the licensing objectives".

## **9.0 Relevant sections of the Licensing Policy**

### **Prevention of a public nuisance**

**At paragraph 9.1** "Licensing Sub Committees will be mindful that licensed premises, especially those operating late at night and in the early hours of the morning, can cause a range of nuisances impacting on people living, working or sleeping in the vicinity of the premises. When addressing public nuisance the applicant should identify any particular issues that are likely to affect adversely the promotion of the licensing objective to prevent public nuisance. They should then include in the operating schedule how they will deal with those matters. The concerns mainly relate to noise nuisance from within the premises or from the use of any outside areas, light pollution, smoke and noxious smells. Due regard will be given to the impact these may have and the Licensing Authority will expect operating schedules to satisfactorily address these issues."

**At paragraph 9.3** "Applicants should give particular consideration to measures to reduce the occurrence of public nuisance associated with accommodating smokers outside the premises, following the introduction of smoke free areas in enclosed or substantially enclosed places."

**At paragraph 9.7** "Applications referred to the Licensing Sub-Committee will be determined on the individual merit of each case. The Licensing Sub-Committee have the power to impose specific conditions when considered necessary in respect of the Prevention of Public Nuisance objective."

**At paragraph 7.6,** "Applications referred to the Licensing Sub-Committee where relevant objections have been received will be determined on the individual merit of each case. The Licensing Sub-Committee has the power to impose specific conditions when considered necessary in respect of the Crime and Disorder objective."

#### **14.0 Representations**

**At paragraph 14.1,** "This policy will not seek to exclude any rights enshrined in the Act or any other legislation for applicants or those making representations against applications. Each application and representation will be treated on its merits taking into account the legislation, the Guidance issued under section 182 of the Licensing Act 2003 and this policy."

**At paragraph 14.2,** " Representations can be made to the Council, as Licensing Authority, by a 'Responsible Authority' or by 'Interested Parties' which include bodies or individuals who live in the vicinity of such a premises, and residents association, trade associations and other businesses operating in the vicinity. Representations can be made concerning:-

- Applications for new premises licences or club premises certificates
- Applications to vary premises licences or club premises certificates
- Personal licence applications on criminal grounds (only by the Police)"

**At paragraph 14.3,** "Responsible Authorities are the public authorities specifically designated under the Licensing Act 2003 to be consulted on all licence applications and are also entitled to make representations."

**At paragraph 14.10,** "All valid representations will form part of a committee report that will become a public document. It will be given to the applicant, their agent, responsible authorities, other persons making representations and any other party requesting a copy as well as the Licensing Sub-committee 10 working days prior to the hearing. Anonymous representations will not be accepted."

#### Licence Conditions

**At paragraph 17.1,** " Conditions on premises licences and club certificates are determined by:

- a) The measures put forward on the Operating Schedule
- b) Mandatory conditions within the Act
- c) Measures decided at a hearing by the Licensing Sub Committee"

**At paragraph 17.2,** "Any conditions attached to licences following relevant representations will focus on matters within the control of the Premises Licence Holder or Club Management Committees. They will address matters which have a direct impact on those living, working or engaged in normal activities in the vicinity, as well as patrons of the licensed premises. They will not be used as a means of attempting to attach responsibility to Premises Licence

Holders or Club Management Committees for matters outside their reasonable control, such as anti-social behaviour once away from the premises or licensable activity".

**At paragraph 17.3,** "The Licensing Authority will not impose standard conditions upon every licence issued, however it may have regard to model conditions produced by the Government and/or the Institute of Licensing and it may choose to impose these in appropriate circumstances".

## 10.0 LEGAL CONSIDERATIONS

When considering licence variation applications the Sub-Committee is required carry out its functions with a view to promoting the licensing objectives. The licensing objectives are:

- Prevention of crime and disorder
- Public Safety
- Prevention of public nuisance
- Protection of children from harm

The Sub-Committee must ensure that all licensing decisions have:

- A direct relationship to the promotion to the promotion of one or more of the four licensing objectives;
- regard to the Council's statement of licensing policy;
- regard to the Secretary of State guidance; and
- not be made as a result of a blanket policy which is applied so rigidly that an exercise of discretion in each individual case is precluded

Applications must be considered with regard to the principles of fair process and the Human Rights Act 1998.

When considering an application for the variation of an existing Premises Licence, only the variation is subject to determination. An application to vary the premises licence concerns variation of the conditions attaching to the licence or of the authorised licensable activities.

The application to vary must be accompanied by the Premises Licence (unless that is impracticable when a statement explaining why must be provided).

The authority must make the variation as applied for, subject to the mandatory conditions, unless relevant representations are made, in which case a hearing must be held.

Where relevant representations are made, the Licensing Authority must hold a hearing to consider them, unless it is agreed that a hearing is unnecessary (s.35(3)(a)). The Licensing Authority must then take such of the following steps as it believes to be appropriate for the promotion of the licensing objectives:

- (a) modify the conditions of the licence or
- (b) reject the whole or part of the application (s.35(3)(b) and (4)).

When determining applications to vary an existing Premises Licence, the Sub-Committee must consider all relevant representations that are made before taking such steps (if any) as it considers necessary for the promotion of the licensing objectives. The steps that may be taken are as follows:

- grant the variation as applied for;

- modify the conditions of the licence (conditions are deemed to be modified if they are altered/omitted or new conditions are added); and
- reject whole or part of the application to vary the licence.

Any modification of conditions should be confined to those considered appropriate in respect of the particular variation sought.

Officers have provided the Sub-Committee with recommendations related to this application. Subject to the above-mentioned factors having been properly considered, the Sub-Committee may depart from the recommendations if there are good reasons for doing so. The Sub-Committee is advised that such departures could give rise to an appeal or judicial review.

In order for representations to be 'relevant' they must have been made by an interested party or a responsible authority (see the definitions in [section 13](#)) and they must relate to the likely effect on the promotion of the licensing objectives if the application were to be granted.

If the representations are made by an interested party there is a further requirement that the licensing authority does not consider them to be frivolous or vexatious. If it thinks they are, it must explain its decision to the person who made the representations.

The need for a hearing can be dispensed with by agreement of the authority, the applicant for the variation and all of the parties who have made relevant representations.

The authority must notify its decision to the applicant, the police and any person who has made relevant representations, and must give reasons for its decision.

A variation of a premises licence may impose different conditions on different parts of the premises, or impose different conditions in relation to different licensable activities.

#### S.182 guidance on attaching Conditions

10.2 Conditions include any limitations or restrictions attached to a licence or certificate and essentially are the steps or actions that the holder of the premises licence or the club premises certificate will be required to take or refrain from taking in relation to the carrying on of licensable activities at the premises in question. Failure to comply with any condition attached to a licence or certificate is a criminal offence, which on conviction is punishable by an unlimited fine or up to six months' imprisonment. The courts have made clear that it is particularly important that conditions which are imprecise or difficult for a licence holder to observe should be avoided.

10.8 The licensing authority may not impose any conditions unless its discretion has been exercised following receipt of relevant representations and it is satisfied as a result of a hearing (unless all parties agree a hearing is not necessary) that it is appropriate to impose conditions to promote one or more of the four licensing objectives. In order to promote the crime prevention licensing objective conditions may be included that are aimed at preventing illegal working in licensed premises. This provision also applies to minor variations