



Three weeks after the Brexit referendum: Three letters from a Disunited Kingdom

England, Simon Usherwood:

The days since the referendum result have unfolded in a fashion that no one could have predicted (and if they had, then no one would have believed them). The high drama of multiple resignations, leadership challenges, economic confusion and public anxiety has obscured much of the original issue, namely the UK's relationship with the EU.

The lack of a new Prime Minister means that the British government cannot, at present, officially notify the EU of its intention until September at earliest. However, there is much debate about whether a further delay is necessary, mainly to allow the new British government to decide what it makes to ask of the EU. This might mean a delay until 2017, by which time the French Presidential election and German federal election will slow down progress: as a result, the other member states are keen to get moving on negotiations.

While the other member states cannot force the UK to notify, if the British want to have more friendly discussions, then there will need to be some announcement of at least a timetable by autumn. However, financial markets might prove to be more influential than politicians: as recent days have shown, the uncertainty around Brexit is making many investors unwilling to remain exposed to the risks of an indefinite process.

All of this might be a basis for some reversal of policy. We know that most MPs are pro-membership, but the referendum result will force them to pass any resolution or Act that gives effect to leaving. For all the talk about reversing that decision, this looks impossible without a second referendum or a general election. With none of the Tory leadership contenders ready to make the second option happen any time before the planned date of 2020, the working assumption has to be that the UK is indeed leaving the EU.

Northern Ireland, Mary Mc Murphy:

It has been an extraordinary couple of weeks, and the situation for Northern Ireland is curious to say the least.

As you will be aware NI voted to remain - 56% in favour of the UK staying in the EU. The NI result has emboldened Sinn Fein to push for a border poll, or a referendum on a united Ireland. The Good Friday Agreement provides that a referendum on Irish unity may be held if there is evidence of support for such a referendum among both communities. Sinn Fein is proposing that the UK vote to Leave clashes with the NI preference to Remain, and thus provides evidence of increased support for a united Ireland among nationalists and unionists. There is little to suggest, however, that we can equate the Remain vote in NI with increased support for a united Ireland. Opinion polls over recent years have, in fact, demonstrated that support for a united Ireland is not strong – even among nationalists, who have come to accept the devolved arrangements in NI. This referendum result certainly changes the context within which Irish unity might be understood, but it does not signal a change of political aspiration for unionists – and remember, a majority of unionists voted to Leave the EU.

The aftermath of this referendum has demonstrated how divided UK society is and it is clear that there is a territorial division too, with both Scotland and NI voting to Remain. As the EU settlement with the UK is thrashed out over the next few years, support for a united Ireland may develop and there may well be a time in the future when deeper discussion of a united Ireland is warranted. How Scotland reacts will be important. Should Scotland hold another independence referendum and then vote to leave the UK, the integrity of the UK is undermined and so the possibility of Irish unity may

become more appealing. At this moment in time however, there is no broad appetite or logic for holding a border poll in NI.

The impact of this referendum result on stability in NI is difficult to judge. The nature of the post-Brexit UK-EU deal will be decisive. If some sort of hard border is imposed between North and South, this may give paramilitaries cause to return to violence. The dissident groups, in particular, may seek to manipulate the situation, although their base is weak. The marching season will also bring loyalists on to the streets and some clashes with nationalists may ensue. The NI vote demonstrates some continuing communal division which may be used by sinister forces to test the peace process.

The Taoiseach's plan to create a North-South All-Island Forum to discuss the Brexit question has been heavily resisted by unionists and will not now be created. It's clear that tensions continue to exist between the two communities in NI and this vote has not helped to diminish these – in fact, it may have heightened those tensions further.

On a positive note, the peace process have been ongoing for two decades now and it is to be hoped that the political parties, their leaders and supporters, have reached a level of maturity which will allow them to resist any possibility of a return to violence.

In short, the situation in NI is very fluid. How things develop will be dependent on what sort of UK-EU deal is agreed and how that deal is implemented. Lots of questions and lots of research – but hopefully the above gives you a good sense of where things stand.

Scotland, Michael Keating:

In 2014 Scotland voted by 55 per cent to stay in the United Kingdom. Now it has voted by a larger margin (62 per cent) to stay in the European Union. It cannot, it seems, remain in both and must choose. There is now a search for some way in which Scotland, without going for independence right away, could somehow stay within the EU (either the economic or the political union).

One way would be to stop Brexit happening. The legislation to take the UK out of the EU would on first sight require the consent of the Scottish Parliament. This is because it would impinge on devolved matters such as agriculture, fisheries and other issues.

Then there is talk of a 'Greenland in reverse'. Greenland has domestic home rule within Denmark, as Scotland does within the UK, but in 1979 withdrew from the European Union. The Faroe Islands, also part of Denmark, never went into the Union to begin with. But these do not provide precedents for Scotland. They are small parts of a state, the larger part of which is in the EU and therefore able to play a full role in European matters and even look after the interests of the islands where necessary. In the case of Scotland, there would be no member state as a reference point and the larger part of the state would be outside the EU.

Another possibility arises from the fact that, after Brexit, many of the competences currently at European level will revert to the Scottish parliament. These include agriculture and fisheries, environment policy and areas of higher education including university fees and research. It might be that the Scottish Government would continue to look to Brussels rather than London for policy leadership in these matters and seek to align its policies with those in Europe. It could continue to cultivate partnerships with regions and cities in Europe and engage in cooperation with them. None of this, however, would touch on the big issues of the single market, trade and free movement of people, nor would they give Scotland a role in EU policy making. For most purposes, Scotland would be outside both economic and political unions.

The clearest way of remaining fully in the EU would be for Scotland to become independent, after another independence referendum. Brexit provides a justification for this, as it was made clear at the time of the 2014 independence referendum that No meant remaining in a United Kingdom within the EU. Indeed, the No side made great play of the risk that Scotland, outwith the UK, would be outside the EU as well and that only staying in the British union could keep them within the European one.

Yet the path would not be easy. Westminster's consent would still be required for an independence referendum. There are some political forces in England, English-nationalist in their thinking, who are relaxed about Scottish independence

and could even welcome it, but there is still a unionist majority at Westminster. Whatever the moral arguments, other EU states would not necessarily welcome Scottish secession from the UK. The acting Spanish prime minister, with Catalonia in mind, has already declared that if the UK leaves the EU, Scotland leaves. Neither EU institutions nor other member states would want to get the issue of Scotland mixed up with Brexit negotiations or be seen to be helping the break-up of a European state. This makes seamless transition to independence with simultaneous EU membership very difficult.

It would be easier if Scottish independence came first, before the UK actually left the EU. Then Scotland could apply to join the EU. Contrary to what was said last time by some people, this would not involve joining a queue. There is no queue for EU membership and new member states come in as they are ready. Scotland might hope for a fast-track admission in view of the fact that it meets the entry criteria.

With Scotland in the EU and the rest of the UK outside, however, there would be a hard border between Scotland and England. Access to the UK market for Scottish goods and services and Scottish workers would be hampered. Since the UK market is much more important than the rest of Europe to Scottish business, this might not look like a good bargain.

If the rest of the UK were to negotiate some kind of access to the single market, however, matters could be easier. It is difficult at this stage to know exactly what the new government's attitude will be and the Leave side spoke with two voices about the need to retain the single market, sometimes talking of 'access' to the single market as though this were somehow different from being in it.

Other member states have made it clear throughout this whole process that free movement of labour is an essential part of the single market and not up for negotiation. Some kind of free trade agreement is likely, perhaps with some restricted provisions on free movement. The essential point is that, the more free trade the UK negotiates with the EU, the easier it would be for Scotland to keep itself in both the UK and European markets. A Norway-type deal, with full UK membership of the single market, would be the best of all for Scotland's economic interests.

Perhaps the crucial problem concerns the sequence of events. We still have little idea of what the alternative to EU membership is and how fast events will move. Decisions taken at one time can close off options for the future or open them up. A premature and losing independence referendum would destroy Scotland's bargaining position. A failure to agree a way forward could divide the Scottish nation, just as the UK has been divided by Brexit. Polls before the European referendum suggested that the prospect of Scotland being taken out of the EU against its will increased support for independence only marginally. Polls taken in the immediate aftermath of the vote are a poor guide to long-term attitudes. Scots have not been obsessed with Europe as have people in some parts of England, nor has the migration debate been as strident, but nor have Scots been outstanding Europhiles.

It may be not so much the European issue itself that influences the public but the shape of the post-Brexit government and its lack of appeal in Scotland. Europe may just add to the list of issues on which the political agenda is being shaped differently in Scotland from England and Wales and another sign of the rebuilding of the nation as the main political point of reference for its people.

The United Kingdom has been moving towards a new form of statehood, beyond the traditional categories of independence and sovereignty. Brexit represents a sharp reassertion of sovereignty, with the slogan 'take back control' in a world in which the old certainties of sovereignty have gone. As the UK is reconfigured in the wake of Brexit, the one thing of which we can be reasonably sure is that it will not represent a return to the union of old.