Consultation feedback report:

Chapter 4: Selection of Route Option E

Version: Draft
Date: 26/05/2023

4. The selection of Route Option E

4.1 Your feedback and our response

This chapter provides our responses to the feedback we received about the selection of Route Option E as our preferred route for the section of new railway between Bedford and Cambridge following the 2019 consultation.

We didn't specifically seek feedback on the selection of Route Option E during the 2021 consultation, but we received sufficient comments related to this topic that we felt a chapter summarising feedback would be useful. This feedback has been grouped under the following headings, which cover the main themes raised:

- Requests to reconsider the selection of Route Option E.
- Suggested alternatives to Route Option E.
- Matters to consider when selecting an alignment within Route Option E.

Throughout this section text in *italics* is our response to the matters raised in your feedback.

We've only included comments that relate directly to the selection of Route Option E within this chapter. More general matters, or those related to the approach to Cambridge for example, are included in the relevant chapters of this report.

Our website contains more information on the 2019 consultation as well as the Preferred Route Option Announcement Report which explains how and why Route Option E was selected as the preferred route between Bedford and Cambridge.

4.1.1 Requests to reconsider the selection of Route Option E

Respondents provided a number of reasons why they felt the selection of Route Option E should be reconsidered. These included the impact of Route Option E on the environment and the need for greater consideration of other local developments – including housing.

4.1.1.1 Environmental impact

Respondents said that the selection of Route Option E should be reopened because of the potential environmental impact. Others said it should be reopened specifically on the basis that it would require longer and steeper alignments than alternative route options and, as a result, would generate higher carbon emissions when trains are operating on the new railway.

Cambridge City Council and South Cambridgeshire District Council also suggested that further details need to be published about the environmental, social, and economic impacts of the options.

In 2019, we consulted on five possible route options for EWR. Our decision to choose Route E as our preferred route reflected the feedback we received from local communities, in which it

was identified as the most popular option. Route Option E also received the highest score on four of the five key Assessment Factors: transport user benefits (1), environmental impacts and opportunities (14) (equal to Route Option B), and contribution to enabling housing and economic growth (2). Detailed economic modelling indicated that Route E would provide the greatest benefits for transport users and would contribute to wider economic benefits. For Bedford, Route E would serve Bedford station and Bedford St Johns station directly, providing convenient access to other rail services, transport modes, local homes, businesses and facilities, such as Bedford Hospital. Having reconsidered in light of 2021 consultation feedback, the preference remains unchanged to select Route E.

We considered the potential environmental impacts and opportunities of the route options presented during the 2019 consultation and did a more detailed assessment of these impacts when selecting the preferred route option in 2020. Based on this assessment, we concluded that Route Option E via Bedford town centre and Cambourne had the fewest problematic areas, alongside Route Option B.

Our decision to select Route Option E was based on several factors, including the environmental impacts and opportunities Assessment Factor (14). For example, the feedback to our 2019 consultation ranked Route Option E as the best performing on this assessment factor. Having reconsidered in light of 2021 consultation feedback, the preference remains unchanged.

In relation to carbon, potential emissions that come from the operation of trains are important when considering the potential carbon impact of the railway. We did not consider that operational carbon emissions were likely to differentiate to a material degree between the route options consulted on in 2019 and having reconsidered in light of 2021 consultation feedback, the preference remains unchanged.

To help inform the options we shared in the 2019 consultation and the preferred route option decision published in 2020, we carried out various types of analysis. This included a high-level appraisal of transport user-related carbon emissions, in line with the requirements of the Department for Transport's (DfT's) Transport Appraisal Guidance (TAG) Unit A3. At that time, we were not required to carry out other carbon assessments as part of that process, but we'll continue to review requirements, throughout the development process, as guidance is updated and added.

We have established a carbon management process that aligns with PAS2080 (the standard for carbon management on infrastructure projects) and as the Project develops, we'll publish an assessment of the whole-life carbon emissions associated with the Project. This will first be published as part of the Preliminary Environmental Information Report (PEIR) during the statutory consultation and then within the Environmental Statement (ES) submitted as part of the Development Consent Order (DCO) application.

This assessment will include an analysis of both the embodied emissions associated with constructing the railway, but also the emissions associated with operating the railway. Emissions associated with the operation of trains will be calculated and assessed, but are not

considered a differentiator between the route options presented in the context of whole-life emissions.

4.1.1.2 Interaction with other development projects

Respondents suggested that the decision to serve Cambourne should be revisited as the new railway would duplicate the proposed C2C busway between Cambourne and Cambridge being promoted by the Greater Cambridge Partnership.

We think that it's important for the new railway to complement other local transport initiatives and infrastructure without duplicating them.

With respect to the C2C busway, EWR services at Cambourne wouldn't duplicate this proposed new busway between Cambourne and Cambridge. The busway would allow customers to access convenient services to north, west and central Cambridge, which also serves villages in-between, while the preferred route alignment for EWR would provide quick, direct links to Cambridge South and Cambridge stations. This means that the new railway and the busway would complement each other, which was an important consideration for respondents. The alignments we proposed that use the southern approach to Cambridge would in principle be able to provide these connections, so it's not a differentiating factor in our decision and wouldn't cause us to re-open the decision to select Route Option E as the preferred route option.

We'll work with C2C to understand if there are design and/or construction efficiencies to reduce cumulative impacts of the proposed C2C busway and EWR.

4.1.2 Suggested alternatives to Route Option E

Respondents proposed a number of alternative routes and alignments that they suggested should be selected instead of Route Option E and the alignment options being considered within it. Others expressed a strong preference for a specific alternative alignment. These included avoiding Bedford town centre as suggested by the campaign group Bedford for a Re Consultation (BFARe), requests to serve Bassingbourn, following the route of existing dual carriageways and reusing the Varsity Line.

4.1.2.1 Route to avoid Bedford town centre

In comments linked to the identification of Route Option E as our preferred route, some respondents said that the railway should not pass through Bedford town centre. They suggested an alternative route that would by-pass the town to the south with a new station outside the town centre, with EWR services either reversing at Bedford station en route, or customers having to change onto a connecting service to reach the town centre.

Route options passing to the south of Bedford were considered before the selection of a preferred route option in 2020. It was found that these routes have a significant number of sensitive or complex environmental constraints which are likely to be difficult and expensive to overcome, including either demolition of homes and commercial property in Wixams or

crossing the former landfill site at Elstow. Bearing in mind the consultation feedback received, we have also revisited the case for promoting a route alignment to the south of Bedford in since close of the non-statutory consultation as part of the Economic and Technical Report – you can read about this in the Economic and Technical Report. We considered scheme options potentially including a station such as a Bedford South parkway. We found that when compared to central Bedford station locations, a Bedford South parkway station would not provide the same benefits from connection to existing population centres, nor would it enable a level of future housing growth and development that would be sufficient to outweigh the benefits of connectivity achieved by serving existing population centres. Parkway station would not provide the same benefits from connection to existing population centres, nor would it enable a level of future housing growth and development that would be sufficient to outweigh the benefits of connectivity achieved by serving existing population centres.

If services were to reverse at Bedford station, this would increase journey times and be more complex operationally, which would reduce the resilience of the services and make timetabling more difficult.

Respondents suggested that some EWR services could serve Bedford town centre with others by-passing the town.

Having some EWR services serving Bedford town centre with others by-passing the town would mean that both sets of services would be less attractive and provide fewer benefits because of the reduced frequency of services to Bedford. It would also mean that some trains wouldn't call at all stations and others would have longer journeys because of the reversing manoeuvre. The area south and southeast of Bedford contains a significant number of sensitive or complex environmental constraints which would be difficult and expensive to overcome if the railway was to be constructed in this location, including: large areas of floodplain which would require significant stretches of viaducts; large areas of best-grade agricultural land; and heritage assets and areas of ancient woodland. It would also require either demolition of homes and commercial property in Wixams or crossing the former landfill site at Elstow which would be complex and more expensive for the remediation costs alone, exclusive of any new infrastructure required.

Respondents suggested that a route alignment passing to the south of Bedford should be selected because it would be shorter, flatter, cheaper and have fewer impacts on the environment. There were references to an alternative alignment promoted by BFARe.

As part of the selection process for the preferred route option, we took into account the potential environmental impacts of the options being considered, as highlighted by the map in Figure 13. As set out in the Preferred Route Option Announcement Report in 2020, Route Option B, which is most similar to the BFARe alignment, and Route Option E performed the best in relation to the potential environmental impacts and opportunities. There are a number of potential environmental challenges associated with both Route Options E and B, but ultimately the impact of the Bedford to Cambridge section of EWR on environmental features would be determined by the specific route alignment that is chosen.

In addition, a route alignment to the south of Bedford would mean that EWR wouldn't be able to serve Bedford station or Bedford St Johns station directly, which would reduce the overall benefits for the town and the Project. BFARe has suggested that the provision of new connecting lines south of Bedford to allow some EWR services to serve the town centre would be possible, but this would still have the following disadvantages:

- *Bedford town centre would see a significant reduction in services per hour to Cambridge, Bletchley and Oxford. This would make the new railway less attractive and convenient for prospective passengers.*
- *A significant amount of additional infrastructure would be needed, including a complex viaduct over the River Great Ouse and the A421 dual carriageway south of Bedford.*
- *Timetabling would be more complex because of the close proximity of multiple junctions, which would adversely affect performance and reliability of the new services.*

The information that respondents have provided either isn't new or wouldn't change these conclusions, so a route alignment following Route Option E and passing through Bedford town centre remains preferable. All of the alignments proposed take this route, so it's not a differentiating factor between them.

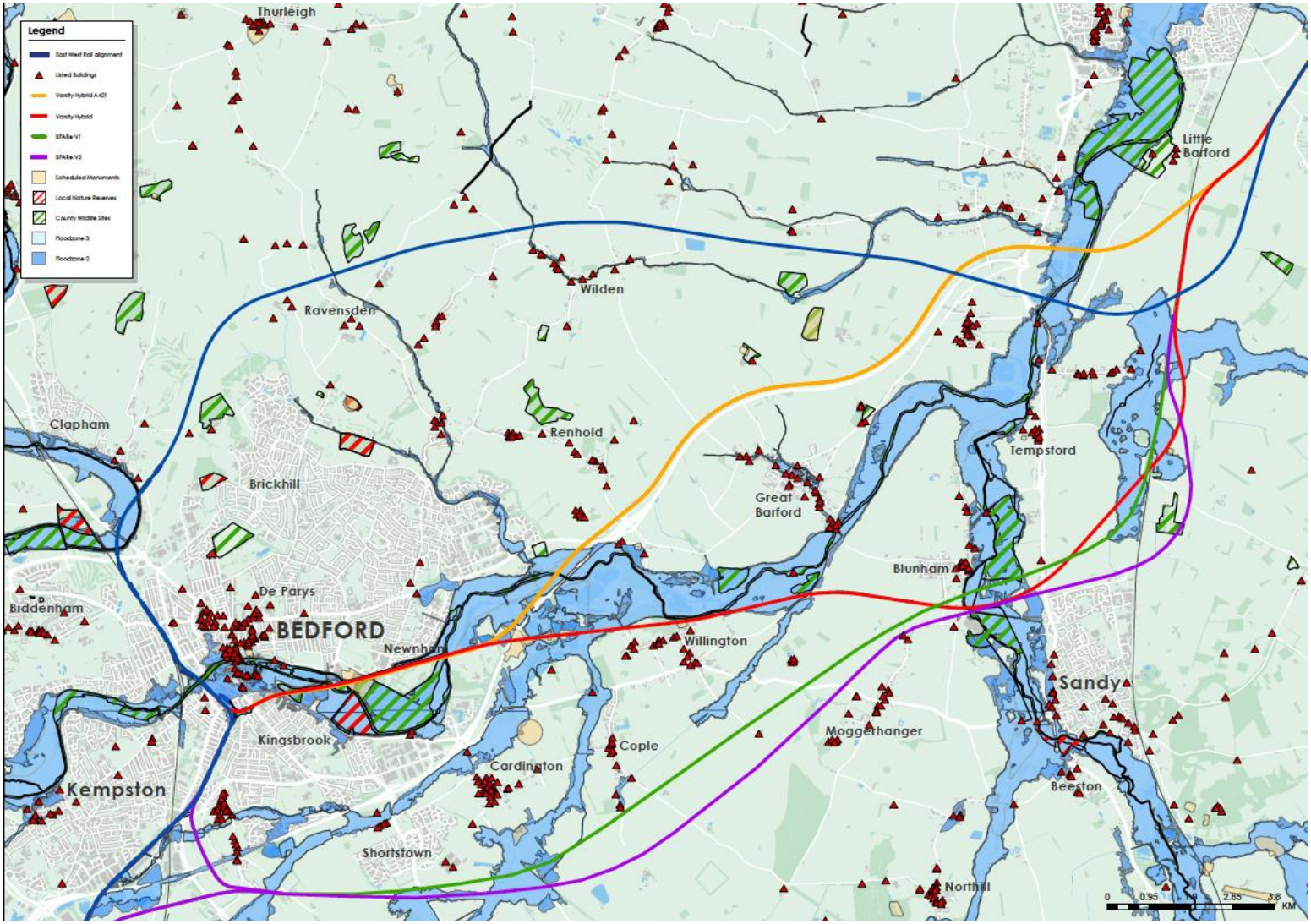

Figure 13. Comparison of environmental constraints north and south of Bedford

4.1.2.2 Use the former Varsity Line

Respondents said that we should select an alignment that re-used some or all of the Varsity Line, the route of the former London and North-Western Railway line between Bedford and Cambridge.

We considered the possibility of re-using this former railway, but we ruled it out for various reasons. These included:

- *The potential need to demolish a number of homes, commercial properties and take additional land including school playing fields, where the route has been built over, as well as the direct interaction with the Mullard Radio Astronomy Observatory (MRAO), which occupies a significant stretch of the old trackbed.*
- *Potential land acquisition and impact on Priory Country Park, an area of public open space in Bedford, requiring replacement land to compensate for that would be taken by EWR. The land in the vicinity is either built upon or within the floodplain, making it challenging to acquire replacement land for the railway and requiring complex additional procedures to secure consent for EWR.*
- *Large lengths of railway in floodplains which would require significant interventions to meet modern safety and engineering standards and, if unmitigated, would pose significant flooding risk within Bedford.*
- *Lack of alignment with Bedford Borough Council's Local Plan 2040 due to loss of open space from the Bedford River Valley Park, conflict with allocation for a water sports lake with residential and education development and substantial interface and conflict with land south of the river for strategic mixed-use development centred on Bedford St Johns station.*
- *Impact on important natural habitats, which have developed on the route of the former rail line since it was closed.*
- *The significant distance between Bedford station and the former Bedford St Johns station on the former London and North Western Railway – over a mile – which would make interchange between EWR and other services unattractive and uncompetitive, and undermine the potential transport user benefits of the Project.*

Having reconsidered, in light of 2021 consultation feedback, the preference remains unchanged to select Route Option E – passing to the north of Bedford and serving Cambourne – as the preferred route option. Please see the Economic and Technical Report, that has been published alongside this Consultation Feedback Report, for more information.

4.1.2.3 Route to serve Bassingbourn

A number of respondents suggested that we should revisit the decision taken in 2020 to serve Cambourne and instead select a different route option serving the Bassingbourn area further south.

We decided to select a route option serving Cambourne in 2020, following the 2019 consultation. The feedback received at that stage of consultation acknowledged that there

was potential for EWR to serve new housing in the Bassingbourn area, should Ministry of Defence facilities be relocated. We note that the Bassingbourn Barracks was upgraded to a Mission Ready Training Centre in 2021 and we are not aware of any significant planning applications for housing at this site. However, route options serving Cambourne performed better in assessments, were ranked higher by the public and supported by our local authority partners. This was because of the benefits not only of facilitating future housing growth, but also the ability to serve the existing settlement at Cambourne and to link with existing public transport alternatives.

Therefore, this matter wouldn't cause us to re-open the decision to select Route Option E – passing to the north of Bedford and serving Cambourne – as the preferred route option.

4.1.2.4 Follow route of existing road infrastructure instead of the identified Route Option E area

Respondents suggested that rather than Route Option E, EWR should follow the route of the existing A421, A428 and A14 roads, passing south of Bedford and north of Cambridge.

The use of route alignments or route options close to the existing A421, A428 and A14, passing south of Bedford and north of Cambridge, have been considered in the selection of a preferred route option – and also in designing alternative route alignments. We acknowledge that there are potential benefits from building a new railway close to other transport infrastructure. For example, the selection of an alignment that runs broadly parallel to the A428 Black Cat improvement scheme being promoted by National Highways between Black Cat and Caxton Gibbet could help to reduce some adverse impacts of the combined schemes. Visual changes to the landscape would be concentrated locally to the A428 dual carriageway rather than in areas not already subject to development, and there may be the opportunity to combine landscaping and other environmental mitigation measures.

However, this is not the case as far as existing dual carriageways are concerned. It would be difficult for the new railway to be close to the A421, A428 and A14 roads because of the existing settlements along the route. For instance, this would mean that selecting an alignment in these areas would 'sandwich' these villages between these busy roads and the new railway – and this would increase the impacts on these local communities from the combined infrastructure. We don't think that this would be desirable, and having reconsidered in light of 2021 consultation feedback, the preference remains unchanged to select Route Option E as the preferred route option.

4.1.3 Considerations when selecting the alignment within Route Option E

Respondents made a number of suggestions around matters that should be considered when selecting the preferred alignment the railway will take within Route Option E. These included interactions with other infrastructure schemes, local plans and other local transport networks and amenities. Others made a variety of comments about the impact of the railway and proposed alignments on the surrounding landscape and on specific features such as the MRAO.

4.1.3.1 Interaction with local plans and other developments

Respondents suggested that a preferred alignment for EWR should not be selected until the Ox-Cam Arc Spatial Framework – which was being developed by the Department for Levelling Up, Housing and Communities – has been completed and adopted.

We'll continue to monitor the progress of new and emerging policy – including the draft Arc Spatial Framework – as EWR aims to serve both existing and potential new communities.

If we postponed the selection of a preferred route alignment for EWR, we wouldn't be able to progress with the detailed designs for the railway aimed at improving the transport links for existing communities across the route, all the way from Oxford to Cambridge. This would delay transport users from realising the many benefits of the new railway.

Respondents said that the design of the railway should be aligned with local development plans. Some suggested that the selection of a preferred route alignment should be postponed pending the adoption of new local development plans for the areas between Bedford and Cambridge, to avoid pre-determining the allocation of new development. Some respondents also said that we should not select a preferred station location at Cambourne until the new Greater Cambridge Local Plan is adopted and any new housing allocations for Cambridge and South Cambridgeshire are confirmed.

The allocation of land for development is a matter for local planning authorities. While the location of EWR stations might facilitate this, the railway is intended to provide new connections for existing settlements, residents and businesses – not just future development and new housing sites.

The selection of Route Option E in 2020 took into account the views of all local planning authorities who responded. When we assessed how potential alignments and station locations at Cambourne compare and how they perform against the objectives set for the Project, we noted how the new railway might facilitate future development in various places, including Cambourne. The selection of a new station location does not in itself, though, dictate where any new development goes – that is part of the normal local plan-making process.

We've been monitoring the progress of new and emerging development plans across the area, including in Bedford Borough, Central Bedfordshire, Huntingdonshire and the proposed Greater Cambridge Local Plans. With the exception of the draft Bedford Local Plan, all of the other emerging local plans are at preliminary stages, so postponing a decision on a preferred route alignment for EWR would delay realising the benefits of the Project across the entire route from Oxford to Cambridge and beyond.

4.1.3.2 Integration with A428 and other major infrastructure schemes

Respondents said that we should look to integrate the new railway with other transport projects in the area, including the A428 Black Cat improvement scheme being promoted by National Highways and local transport networks in and between key towns and villages across the route. Others raised concerns about how the new railway would interact with parts of the

strategic road network such as the existing and proposed dual carriageways, and whether this would preclude road enhancement schemes in the future.

National Highways states that programme coordination between EWR and the A428 Black Cat improvement scheme will have significant, route-wide and local impacts on construction scheduling and traffic management proposals.

The ability for EWR to provide convenient connections to other transport modes and projects formed a key part of our decision to select Route Option E as the preferred route option in 2020. This continues to be the case.

As well as the direct connections that would be provided at existing stations at Cambridge, Bedford and Oxford stations and the proposed new station at Cambridge South, strategically locating the new EWR stations in Route Option E means that our services can integrate with existing and proposed local networks. This would also encourage sustainable access to the new railway.

For example, locating a station at Cambourne will allow passengers to connect between rail services and other transport modes – whether the existing bus network or future transport infrastructure such as the proposed C2C busway to Cambridge – without duplicating the public transport provision already made by or planned for those modes.

We are working closely with other projects in the area, including the National Highways A428 Black Cat improvement scheme team, to manage interfaces and explore opportunities between these projects to reduce some adverse impacts of the combined schemes.

Interactions with the road network are inevitable no matter where the railway is located. In developing potential route alignments and selecting a preferred alignment to focus further design work on, we've considered potential interactions with the existing road network. We believe that it would be possible for the interactions between the preferred EWR alignment and the road network to be managed effectively without significantly affecting the ability to carry out road improvements in the future. This does not materially differentiate between route alignments, although the precise design solution in each location will need more detailed design work. We'll also continue to engage with both National Highways and relevant highways authorities as we develop our proposals.

All of the alignments in Route Option E that we've considered could accommodate this complementary approach and, to make sure that the Project can realise the full benefits, we'll continue to monitor other transport projects across the area. Therefore, this matter does not differentiate between the alignments which EWR Co has proposed and wouldn't cause us to re-open the decision to select Route Option E.

Some respondents said that we should only select a route alignment that stays completely within the area of Route Option E.

During the consultation in 2019, National Highways announced its preferred option for the route of the A428 Black Cat improvement scheme between Black Cat and Caxton Gibbet. This lay just outside the northern boundary of the Route Option E area.

We looked into whether this change of circumstances justified consideration of alignments following the route of the proposed new dual carriageway just outside the Route Option E area. We concluded that these might perform as well as, or better than, alignments located solely within the preferred route option area.

As a result, we provided information on multiple potential route alignments within or close to Route Option E, some of which run parallel the A428 and others that don't, so that respondents could compare them and provide informed feedback. This type of back-checking is an important part of the sequential approach to design that we carry out so that we can deliver the Project.

Our overall conclusion is that an alignment which generally stays within the preferred Route Option E area, but broadly parallels the route of the new A428 dual carriageway between Black Cat and Caxton Gibbet with stations near Tempsford and north of Cambourne, performs best overall. This will be taken forward for further design work.

Respondents suggested that EWR and the A428 should use the same bridge to cross the River Great Ouse south of St Neots.

We've considered whether alignments closer to the new A428 dual carriageway would be more efficient or cost-effective. However, while the two schemes are complementary, they are meant to serve different purposes and the engineering requirements for a road and a railway are different.

In this instance, it would be extremely challenging and costly for the railway to use a single bridge shared with the A428 Black Cat improvement scheme because of the proximity of the new Black Cat junction to the west, which constrains how EWR could connect into it. It would also be likely that the railway or the road would need to be elevated to a significantly higher level, which could lead to additional impacts on neighbouring properties.

Sharing a single bridge over the River Great Ouse would also preclude EWR from serving a new station near Tempsford because the route of the new A428 dual carriageway is located too far to the north.

The preferred route alignment that has been selected would, though, complement the A428 Black Cat improvement scheme by running broadly parallel to it between Black Cat and Caxton Gibbet.

4.1.3.3 Interaction with local road networks and public rights of way

Respondents expressed the importance to local communities of retaining existing roads and public rights of way where possible in the development of potential route alignments within Route Option E. South Cambridgeshire District Council asks that the preferred route option

carefully addresses the issue of severance and the impact to local roads, cycleways, and public rights of way.

In designing potential route alignments we've considered the potential impact on roads and other public rights of way. We are confident that, for those instances we've reported in the 2021 Consultation Technical Report, all roads affected by alignments between Bedford and Cambridge can be kept open following construction of the railway, although in some cases they may need to be re-routed – such as over a new bridge or on a slightly different alignment.

We've also designed the alignments so that they could support new links for non-motorised users, such as by considering footbridges that provide access for a range of pedestrians, including disabled people, or cycle routes. This would reduce the impact on those using these active modes of travel.

In relation to other public rights of way, we've looked at how the different alignments might provide opportunities to preserve existing access to the local area, or even enhance it – such as by providing new links across the existing railway network.

These matters don't materially differentiate between the route alignments and having reconsidered in light of 2021 consultation feedback, the preference remains to select Route Option E.

4.1.3.4 Impacts on Bedford area

Some respondents told us that they were in favour of the selection of Route Option E on the basis that the land north of Bedford was sparsely populated and generally fallow rather than in active agricultural use.

In selecting preferred Route Option E in 2020, we considered the potential impact on agricultural land.

We understand the importance of agriculture to the communities the railway would serve and we aim to find solutions that avoid, reduce or mitigate adverse impacts on land use and agricultural holdings. At each stage of the planning and development process, we'll assess the environmental impacts on important areas such as agricultural land (including best and most versatile land) and the countryside. As part of this, we are exploring ways to reduce the impact of the railway on agricultural land holdings and soil resources. To better understand how the land is used, we'll continue to work with landowners, occupiers and land managers to gather information that will help inform the design process.

We'll carry out further landowner engagement to deepen our knowledge of how the agricultural land that may be affected across the route is used, and to find out where we might need mitigation measures as part of the final detailed design for the Project.

Some respondents supported the selection of a route alignment within the Route Option E area on the grounds that this would avoid potential impacts on historic villages south of Bedford.

We're aware that the railway has the potential to affect different villages depending on where the final route alignment is located. This includes the areas both north and south of Bedford.

In developing potential route alignments, the proximity to villages and historic settlements was an important consideration – and this has been noted in the selection of a preferred alignment, which we'll focus on during further design work. The preferred alignment would avoid potential impacts on historic villages south of Bedford.

Respondents expressed concerns about traffic on the road network. Some argued that building an alignment in the Route Option E area would lead to increases in traffic and pollution, especially in Bedford town centre. Others said that it would help to alleviate existing congestion and traffic problems on the road network.

EWR would improve public transport across the Oxford Cambridge area by providing new, fast, reliable and convenient links between towns and cities. This would help to alleviate existing traffic on the road network by making rail a viable, competitive option for many journeys that are currently made by car. We want to encourage more people to choose to use the railway and reduce car journeys, as this would cut down congestion on the road network and help to make other public transport – such as bus services – quicker and more reliable too.

This, though, relies on locating stations in places that are easily accessible using more sustainable modes such as public transport, cycling, and pedestrian travel. As such, the preferred route alignment locates stations at the heart of existing town centres, within easy reach of homes, businesses and local facilities. It would also link into wider local transport networks, including footpaths, pedestrian routes and cycle paths.

The preferred alignment along Route Option E also offers the opportunity to enhance public transport connectivity to areas proposed for new development in emerging local plans, such as near Stewartby south of Bedford, by serving additional stations en route within easy reach of these areas.

We acknowledge that there would be traffic impacts on the existing road network during construction. We'd seek to reduce the impact of this as much as possible through the adoption of a robust Code of Construction Practice, or equivalent document, but further work is required to confirm the appropriate mitigation measures required in each area. We'd do this at the next stage of design development.

4.1.3.5 Impacts in the Cambridge area

Respondents queried why it was proposed to build Route Option E through the green belt near Cambridge and whether this would lead to restrictions on development being removed.

The designation of land as green belt is the responsibility of the local planning authority rather than EWR Co. Cambridge is surrounded by designated green belt, which means that the railway would pass through it no matter which route option or route alignment is used to approach the city. All alignments would have broadly the same impact on green belt surrounding Cambridge, so this is not a differentiating factor. The only way to avoid this would be to stop serving Cambridge altogether, but this wouldn't meet the Project objectives and would fundamentally undermine its transformative economic potential.

In addition, one of the key benefits of the preferred route alignment – which would enable all EWR services from the west to call at the new Cambridge South station directly – is that this would provide a convenient public transport solution for both current and future workers at the Cambridge Biomedical Campus. This means that EWR could densify the existing developed campus area by replacing current car parking areas with more productive and economically valuable office, laboratory and commercial space.

These matters, then, wouldn't cause us to re-open the decision to select Route Option E.

Concerns were expressed about the potential impact of the new railway on the MRAO to the west of Cambridge.

We took into account the potential for the new railway to affect the MRAO both in the selection of Preferred Route Option E and the development of potential alignments. We'll continue to work closely with the MRAO as our design develops, to mitigate potential impacts. The requirement for mitigation for the MRAO would not cause us to re-open the decision to select Route Option E.