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# **Corporate Intangibles Research and Development Manual**

From: HM Revenue & Customs

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customs)

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<u>updates</u>

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CIRD12755 - Core computational rules: deductible debits: relief for capitalised expenditure on an intangible asset: accounts-based relief: general CTA09/PART8/S729

# Scope

Where a company does not elect for fixed-rate relief (see <u>CIRD12780 (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-intangibles-research-and-internal-manuals/corporate-internal-manuals/corp</u>

<u>development-manual/cird12780)</u>), deductible debits for the depreciation of an asset within Part 8 are calculated by reference to sums written off that asset in its accounts by way of one of the following:

- amortisation
- impairment

## Link with accounts

See <u>CIRD30140 (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird30140)</u> onwards for a description of GAAP as it applies to the amortisation of intangible assets and impairment reviews.

The deductible debit for the purposes of Part 8 is the same as the sum written off that asset on a company's accounts so long as both of the following apply:

- the amortisation or impairment charge in the accounts is in accordance with GAAP (see CIRD30000 (https://www.gov.uk/hmrc-internalmanuals/corporate-intangibles-research-anddevelopment-manual/cird30000) onwards)
- there is no divergence between the value of an asset for the purposes of Part 8 and its accounting value (see <u>CIRD12770</u> (<a href="https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12770">https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12770</a>)

Where there is such a divergence the deductible debit is calculated on a pro-rata basis. See CIRD12760 (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12760) onwards.

# Other relevant provisions

See <u>CIRD12790</u> (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12790) for the computation of deductible debits following the revaluation of an asset in the accounts (or the restoration of past losses).

See <u>CIRD12795</u> (https://www.gov.uk/hmrc-internal-manuals/corporate-intangibles-research-and-development-manual/cird12795) for the computation of deductible debits following the part-realisation of an asset.

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